

Eun Ah Choi

Senior Vice President
Global Head of Regulatory Operations

September 1, 2026

Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Division of Corporation Finance:

This is to certify that on August 25, 2026, The Nasdaq Stock Market LLC (the "Exchange") received from Pacer Funds Trust (the "Registrant") a copy of the Registrant's application on Form 8-A 12(b) for the registration of the following securities:

Pacer Metaurus High Income Autocallable ETF

Pacer Metaurus Enhanced Core Income Autocallable ETF

We further certify that the securities described above have been approved by the Exchange for listing and registration upon official notice of issuance.

We understand that the Registrant is seeking effectiveness under the Form 8-A 12(b), and we hereby join in such request.

Sincerely,

