



By Electronic Mail

February 28, 2020

U.S. Securities and Exchange Commission  
Division of Investment Management  
100 F Street, NE  
Washington, D.C. 20549

RE: Innovator ETFs Trust  
Issuer CIK: 0001415726  
Issuer File Number: 333-146827/811-22135  
Form Type: 8-A12B  
Filing Date: February 28, 2020

To Whom It May Concern:

Please be advised that Cboe BZX Exchange, Inc. has received an application from the above-referenced issuer and has approved the following securities for listing on Cboe BZX Exchange, Inc. ("Exchange"):

- Innovator S&P 500 Buffer ETF - March (BMAR)
- Innovator S&P 500 Power Buffer ETF - March (PMAR)
- Innovator S&P 500 Ultra Buffer ETF - March (UMAR)

The Exchange requests acceleration of registration of these securities under the Securities Exchange Act of 1934, as amended. If there are any questions, please call me at (913) 815-7024. Your assistance is greatly appreciated.

Sincerely,

A handwritten signature in dark ink, appearing to be 'Charles Sullivan', with a long, sweeping horizontal line extending to the right.

Charles Sullivan  
Initial Listings Analyst