

September 30, 2025

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

RE: PGIM Rock ETF Trust

Issuer CIK: 0001992104

Issuer File Number: 333-274664 / 811-23901

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To Whom It May Concern:

Cboe BZX Exchange, Inc. certifies its approval for listing and registration of the PGIM S&P 500 Max Buffer ETF – October under the Exchange Act of 1934.

Sincerely,

Charles Sullivan

Senior Analyst, Listing Qualifications