

**Eun Ah Choi**

Senior Vice President  
Global Head of Regulatory Operations

October 17, 2025

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 October 16, 2025, The Nasdaq Stock Market (the "Exchange") received from ABRDN FUNDS (the "Registrant") a copy of the Registrant's application on Form 8-A 12(b) for the registration of the following securities:

abrdn International Small Cap Active ETF,  
no par value

abrdn Ultra Short Municipal Income Active ETF,  
no par value

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,

