

NEWLINK GENETICS CORPORATION
2503 South Loop Drive
Ames, Iowa 50010

July 18, 2019

Via EDGAR

U.S. Securities and Exchange Commission
Division of Corporation Finance
100 F Street, N.E.
Mail Stop 4720
Washington, D.C. 20549
Attn: Ada D. Sarmento

Re: **NewLink Genetics Corporation**
Registration Statement on Form S-3, as amended
File No. 333-226366

Acceleration Request

Requested Date: Monday, July 22, 2019
Requested Time: 4:00 P.M. Eastern Daylight Time

Ladies and Gentlemen:

In accordance with Rule 461 under the Securities Act of 1933, as amended, the undersigned registrant (the "**Registrant**") hereby requests that the Securities and Exchange Commission (the "**Commission**") take appropriate action to cause the above-referenced Registration Statement on Form S-3 (File No. 333-226366) (the "**Registration Statement**") to become effective on Monday, July 22, 2019, at 4:00 p.m. Eastern Daylight Time, or as soon thereafter as is practicable.

[Signature page follows]

Very truly yours,

NewLink Genetics Corporation

By: /s/ Charles J. Link, Jr.
Charles J. Link, Jr.
Chief Executive Officer

cc:

Carl W. Langren, NewLink Genetics Corporation
Bradley J. Powers, NewLink Genetics Corporation
James Linfield, Cooley LLP
Judy Lai, Cooley LLP
