

July 9, 2019

Kenneth Berlin
President and Chief Executive Officer
Advaxis, Inc.
305 College Road East
Princeton, NJ 08540

Re: Advaxis, Inc.
Registration Statement on Form S-1
Filed July 2, 2019
File No. 333-232526

Dear Mr. Berlin:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Christine Westbrook at 202-551-5019 with any questions.

Sincerely,

Division of

Office of

Corporation Finance

Healthcare & Insurance

cc: Kristopher D. Brown, Esq.