Thomas E. Wirth Chief Financial Officer BRANDYWINE REALTY TRUST 2929 Walnut Street Suite 1700 Philadelphia, PA 19104

> Re: BRANDYWINE REALTY TRUST Form 10-K for the year ended December 31, 2018 Filed February 22, 2019 File No. 001-09106

Dear Mr. Wirth:

We have reviewed your filing and have the following comment. In our comment, we may ask you to provide us with information so we may better understand you

may ask you to provide us with information so we may better understand your disclosure.

Please respond to this comment within ten business days by providing the requested

information or advise us as soon as possible when you will respond. If you do not believe our $% \left(1\right) =\left(1\right) \left(1\right) +\left(1\right) \left(1\right) \left(1\right) +\left(1\right) \left(1\right)$

comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to this comment, we may have additional comments.

Form 10-K for the year ended December 31, 2018

Financial Statements Note 3. Real Estate Investments, page F-29

1. With note your disclosure relating to your acquisition of complete ownership of the Austin

Portfolio. Please tell us how you considered the requirements of Items 2.01 and 9.01)(a)-

(b) of Form 8-K with respect to this acquisition.

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.

You may contact Jorge Bonilla, Staff Accountant, at (202) 551-3414 or Daniel Gordon,

Senior Assistant Chief Accountant, at (202) 551-3486 with any questions.

Thomas E. Wirth

BRANDYWINE REALTY TRUST

August 15, 2019

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Sincerely,

FirstName LastNameThomas E. Wirth

Division of Corporation Finance

Comapany NameBRANDYWINE REALTY TRUST

Office of Real Estate and Commodities

August 15, 2019 Page 2 FirstName LastName