August 24, 2021

Nick Leschly Chief Executive Officer 2seventy bio, Inc. 60 Binney Street Cambridge, MA 02142

> Re: 2seventy bio, Inc. Amendment No. 1 to

Draft Registration Statement on Form 10

Submitted August

12, 2021

CIK No. 0001860782

Dear Mr. Leschly:

We have reviewed your amended draft registration statement and have the following $% \left(1\right) =\left(1\right) +\left(1\right) +$

comments. In some of our comments, we may ask you to provide us with information so we

may better understand your disclosure.

Please respond to this letter by providing the requested information and either submitting

an amended draft registration statement or publicly filing your registration statement on

 $\ensuremath{\mathsf{EDGAR}}.$ If you do not believe our comments apply to your facts and circumstances or do not

believe an amendment is appropriate, please tell us why in your response.

 $\qquad \qquad \text{After reviewing the information you provide in response to these comments and your } \\$

amended draft registration statement or filed registration statement, we may have additional $% \left(1\right) =\left(1\right) +\left(1\right$

comments.

Amendment No. 1 to Draft Registration Statement on Form 10

Business Our Approach, page 100

1. We note your revisions in response to prior comment 3. Please revise your disclosure that you believe that certain technologies "have the potential" to enable bbT369 to drive rapid tumor clearance, a hallmark of the CD19 CAR T cell patients who proceed to achieve complete responses, as this statement still suggests that your product candidate will be effective. You may provide a summary of the data that you used to draw these

conclusions, but not

the conclusions or predictions regarding efficacy.

Nick Leschly

2seventy bio, Inc.

August 24, 2021

Page 2

Our Programs

Multiple Myeloma, page 108

2. We note your revisions in response to prior comment 4. Please remove the disclosure

regarding your belief that the clinical endpoints observed in the Phase 1 CRB-402 study

for bb21217 were "encouraging."

Strategic Collaborations

BMS, page 110

3. We note your revisions in response to prior comment 5. Please revise to disclose the $\,$

royalty rate or range and the royalty term, or how the term is determined, for the royalties

on U.S. sales that you are eligible to receive should you not exercise

your option to codevelop and co-promote bb21217 within the U.S. Please also revise to provide the termination provisions for each of the active agreements with BMS.

You may contact Michael Fay at 202-551-3812 or Lynn Dicker at 202-551-3616 if you have questions regarding comments on the financial statements and related

matters. Please contact Ada D. Sarmento at 202-551-3798 or Irene Paik at 202-551-6553 with any other questions.

Sincerely,

FirstName LastNameNick Leschly

Division of

Corporation Finance Comapany Name2seventy bio, Inc.

Office of Life

Sciences
August 24, 2021 Page 2
cc: Gregg L. Katz, Esq.
FirstName LastName