



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

Mail Stop 3628

May 23, 2016

Via E-mail

Joseph L. Lombardi  
Vice President  
Bank of America, National Association  
214 North Tryon Street  
Charlotte, NC 28255

**Re: BA Credit Card Trust  
Form 10-KT for transition period July 1, 2015 to December 31, 2015  
Filed March 25, 2016  
File No. 333-50316-02**

Dear Mr. Lombardi:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filing and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Arthur C. Sandel

Arthur C. Sandel  
Special Counsel  
Office of Structured Finance

cc: Greg Lumelsky, Esq., Bank of America Corporation  
Michael H. Mitchell, Esq., Chapman and Cutler LLP