Arnon Rosenthal, Ph.D. Chief Executive Officer Alector, Inc. 151 Oyster Point Boulevard Suite 300 South San Francisco, CA 94080

Re: Alector, Inc.
Amendment No. 1 to
Draft Registration Statement on Form S-1
Filed November 16, 2018
CIK No. 0001653087

## Dear Dr. Rosenthal:

We have reviewed your amended draft registration statement and have the following

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  $% \left( 1\right) =\left( 1\right) +\left( 1\right)$ 

an amended  $\operatorname{draft}$  registration statement or publicly filing your registration statement on

 ${\tt EDGAR.}$  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.

After reviewing the information you provide in response to these comments and your  $% \left( 1\right) =\left( 1\right) +\left( 1\right)$ 

amended draft registration statement or filed registration statement, we may have additional comments.

Amended Draft Registration Statement

Overview, page 1

1. We note your response to comment 3. Please provide context for the research and  $% \left( 1\right) =\left( 1\right) \left( 1\right$ 

development pipeline table by including footnotes that set forth a concise but materially

complete description of each program. Please also discuss the scope of the research phase  $\,$ 

and, given the placement of the arrows, the extent to which the programs listed are  $\frac{1}{2}$ 

preparing to transition to the pre-clinical trial phase.

Arnon Rosenthal, Ph.D.

Alector, Inc.

December 4, 2018

Page 2

Our Pipeline Program

Our PGRN Product Candidates Development Plan, page 104

We note your response to comment 1. Please remove the statement that your PGRN

us why this statement is appropriate in the context it is made.

Notes to Consolidated Financial Statements

2. Summary of Significant Accounting Policies

Revenue recognition, page F-10

3. Please refer to your response to comment 13 and disclose the following:
The duration over which the Phase 2 clinical trials are expected to be completed for

each program (i.e. AL002, AL003), and

The amounts, by program, of AbbVie's exercise option and the aggregate approval

milestones indicating the number of indications covered..

You may contact Keira Nakada at (202) 551-3659 or Jim Rosenberg, Senior Assistant Chief Accountant, at (202) 551-3679 if you have questions regarding comments on the

financial statements and related matters. Please contact J. Nolan McWilliams, Attorney-Advisor,

at (202) 551-3217 or Dietrich King, Attorney-Advisor, at (202) 551-8071 with any other

questions

FirstName LastNameArnon Rosenthal, Ph.D.

Corporation Finance Comapany NameAlector, Inc.

& Insurance December 4, 2018 Page 2 cc: Tony Jeffries FirstName LastName Sincerely,

Division of

Office of Healthcare