

Mail Stop 6010

October 29, 2008

Alan W. Dunton, M.D.
Chief Executive Officer
Panacos Pharmaceuticals, Inc.
134 Coolidge Ave.
Watertown, MA 02472

Re: Panacos Pharmaceuticals, Inc.
Form 10-K for Fiscal Year ended December 31, 2007
Filed March 7, 2008
File No. 000-24241

Dear Mr. Dunton:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Jeffrey Riedler
Assistant Director