

Mail Stop 6010

April 15, 2008

David Platt, Ph.D.
Chief Executive Officer and Chairman of the Board
Pro-Pharmaceuticals, Inc.
7 Wells Avenue
Newton, Massachusetts 02459

**Re: Pro-Pharmaceuticals, Inc.
Preliminary Proxy Statement on Schedule 14A
Filed April 3, 2008
File No. 1-31791**

Dear Dr. Platt:

We have completed our review of your preliminary proxy statement on Schedule 14A and have no further comments at this time.

Sincerely,

Jeffrey P. Riedler
Assistant Director

cc: Jonathan C. Guest, Esq.
Greenberg Traurig LLP
One International Place
Boston, Massachusetts 02110