



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

DIVISION OF
CORPORATION FINANCE

October 8, 2010

Anthony D. Squeglia
Chief Financial Officer
Pro Pharmaceuticals, Inc.
7 Wells Avenue
Newton, MA 02459

**Re: Pro Pharmaceuticals, Inc.
Form 8-K
Filed September 30, 2010
File No. 001-31791**

Dear Mr. Squeglia:

We have completed our review of your Form 8-K and have no further comments at this time.

Sincerely,

Tabatha Akins
Staff Accountant