

Via Facsimile and U.S. Mail  
Mail Stop 4720

October 5, 2009

David Teitel  
Chief Financial Officer  
Inverness Medical Innovations, Inc.  
51 Sawyer Road, Suite 200  
Waltham, MA 02453

**Re: Inverness Medical Innovations, Inc.  
Form 10-K and Form 10-K/A for the Fiscal Year Ended December 31, 2008  
Definitive Proxy Statement filed April 30, 2009  
File Number: 001-16789**

Dear Mr. Teitel:

We have reviewed your September 22, 2009 response to our September 1, 2009 letter and have the following comments. In our comments, we ask you to provide us with information to better understand your disclosure. Where it requests you to revise disclosure, the information you provide should show us what the revised disclosure will look like and identify the annual or quarterly filing, as applicable, in which you intend to first include it. If you do not believe that revised disclosure is necessary, explain the reason in your response. After reviewing the information provided, we may raise additional comments and/or request that you amend the above filings.

**Form 10-K/A for the Fiscal Year Ended December 31, 2008 filed April 10, 2009**

Consolidated Statement of Cash Flows, page F-8

1. Refer to your response to prior comment three. You stated on page F-42 in your 2007 10-K that your estimated amortization expense for 2008 was \$124.9 million. Your Cash Flow Statement in your 2008 10-K states that your depreciation and amortization in 2008 was \$267.9 million in 2008, which is significantly higher than last year's depreciation and amortization and significantly higher than the amortization expense estimate for 2008. Please provide us a breakdown of the \$267.9 million, and tell us why the amount is significantly higher than last year and why significantly higher than the previously estimated amount of amortization for 2008. Please provide additional disclosure as necessary.

Notes to Consolidated Financial Statements  
(2) Summary of Significant Accounting Policies  
(1) Revenue Recognition, page F-13

2. Refer to your response to prior comment two. Please tell us how you determined the performance criteria with respect to your service revenue contracts is under your control given that a portion of your fees are refundable to the customer based on the financial cost savings of the customer. It appears that if the contingency is reliant on actions of the customer, the fees are not fixed and determinable and do not meet the criteria for revenue recognition.

(13) Investment in Unconsolidated Entities and Marketable Securities  
(a) Equity Method Investments  
(i) Joint Venture with P&G, page F-52

3. Refer to your response to prior comment four. Please provide us a detailed analysis supporting your conclusion that the joint venture with P&G was deemed to be a business under ASC 810-10-55-9 through 15 (formerly Appendix C of FIN 46(R)).

**Definitive Proxy Statement filed April 30, 2009**

Compensation Discussion and Analysis  
Executive Compensation Process  
Elements of Compensation, page 23

4. In response to prior comment six, you state in your revised disclosure for each of Mr. Zwanziger, Dr. Scott, Dr. McAleer and Dr. Geraty that the Compensation Committee considered, among other factors, “his performance and contribution to our overall goals and objectives” in increasing base salary and granting stock option awards. Please expand your disclosure to disclose your overall goals and objectives. Please also describe the performance and contribution by each above named executive officer in relation to each goal and objective, including, as applicable, the level of achievement of these goals and objectives and how the level of achievement affected the adjustments to base salaries and grant of stock option awards.

\* \* \* \*

Please provide us the information requested within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter with your response that keys your response to our comments. Detailed cover letters greatly facilitate our review. Please furnish your letter on EDGAR under the form type label CORRESP.

David Teitel  
Inverness Medical Innovations, Inc.  
October 5, 2009  
Page 3

You may contact Staci Shannon, Staff Accountant, at (202) 551-3374 or Mary Mast, Review Accountant, at (202) 551-3613 if you have any questions regarding the processing of your response, as well as any questions regarding comments on the financial statements and related matters. You may contact Jennifer Riegel, Staff Attorney, at (202) 551-3575 with questions on the Definitive Proxy Statement comment. In this regard, do not hesitate to contact me, at (202) 551-3679.

Sincerely,

Jim B. Rosenberg  
Senior Assistant Chief  
Accountant