



DIVISION OF  
CORPORATION FINANCE

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

July 9, 2010

**Via U.S. mail and facsimile (609) 860-0357**

Mr. Randolph Gress  
Chief Executive Officer  
Innophos Holdings, Inc.  
259 Prospect Plains Road  
Cranbury, New Jersey 08512

**RE: Innophos Holdings, Inc.  
Form 10-K for the fiscal year ended December 31, 2009  
Filed March 8, 2010  
Definitive Proxy Statement on Schedule 14A  
Filed April 29, 2010  
File No. 001-33124**

Dear Mr. Gress:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Pamela Long  
Assistant Director