



DIVISION OF  
CORPORATION FINANCE

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

April 13, 2020

Vincent J. Angotti  
Chief Executive Officer  
AcelRx Pharmaceuticals, Inc.  
351 Galveston Drive  
Redwood City, CA 94063

**Re: AcelRx Pharmaceuticals, Inc.**  
**Registration Statement on Form S-4**  
**Filed April 6, 2020**  
**File No. 333-237584**

Dear Mr. Angotti:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Irene Paik at 202-551-6553 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Life Sciences

cc: Rama Padmanabhan - Cooley LLP