

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

November 29, 2023

Vincent J. Angotti Chief Executive Officer AcelRx Pharmaceuticals, Inc. 1850 Gateway Drive, Suite 175 San Mateo, CA 94404

> Re: AcelRx Pharmaceuticals, Inc. Registration Statement on Form S-3 Filed November 22, 2023 File No. 333-275721

Dear Vincent J. 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 Daniel Crawford at 202-551-7767 with any questions.

Sincerely,

Division of Corporation Finance Office of Life Sciences

cc: John T. McKenna, Esq.