UNITED STATES SECURITIES AND EXCHANGE COMMISSION December 19, 2017

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

AcelRx Pharmaceuticals, Inc.

File No. 1-35068 - CF#35767

AcelRx Pharmaceuticals, Inc. submitted an application under Rule 24b-2 requesting an extension of a previous grant of confidential treatment for information it excluded from the Exhibits to a Form 10-Q filed on May 2, 2016.

Based on representations by AcelRx Pharmaceuticals, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit will not be released to the public for the time period specified:

Exhibit 10.6 through December 12, 2022

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Brent J. Fields Secretary