

Mail Stop 6010  
Via Facsimile and U.S. Mail

October 27, 2006

Henry E. Blair  
Chief Executive Officer  
Dyax Corp.  
300 Technology Square  
Cambridge, MA 02139

**Re: Dyax Corp**  
**Form 10-K for Fiscal Year Ended December 31, 2005**  
**Filed March 3, 2006**  
**File No. 0-24537**

Dear Mr. Blair:

We have completed our review of your Form 10-K and have no further comments at this time.

Sincerely,

Joseph J. Roesler  
Accounting Branch Chief