

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