Via Facsimile and U.S. Mail Mail Stop 4720

December 8, 2009

Theodore Zucconi Chief Executive Officer Pro-Pharmaceuticals, Inc. 7 Wells Avenue Newton, Massachusetts 02459

Re: Pro-Pharmaceuticals, Inc.

Form 10-K for the Year Ended December 31, 2008

Form 10-Q for the Nine Months ended September 30, 2009

File No. 1-31791

Dear Mr. Zucconi:

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

Sincerely,

Joel Parker Accounting Branch Chief