

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

DIVISION OF CORPORATION FINANCE

October 8, 2010

Anthony D. Squeglia Chief Financial Officer Pro Pharmaceuticals, Inc. 7 Wells Avenue Newton, MA 02459

## Re: Pro Pharmaceuticals, Inc. Form 8-K Filed September 30, 2010 File No. 001-31791

Dear Mr. Squeglia:

We have completed our review of your Form 8-K and have no further comments at this time.

Sincerely,

Tabatha Akins Staff Accountant