Mail Stop 4720

December 14, 2009

Sudhir Agrawal, D. Phil. Chief Executive Officer Idera Pharmaceuticals, Inc. 167 Sidney Street Cambridge, Massachusetts 02139

> Re: Idera Pharmaceuticals, Inc. Form 10-K for the year ended 12/31/2008 Filed March 11, 2009 File No. 001-31918

Dear Dr. Agrawal:

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

Sincerely,

Jeffrey P. Riedler Assistant Director

cc: Louis J. Arcudi, III Rosemary G. Reilly Wilmer Cutler Pickering Hale and Dorr LLP 60 State Street Boston, Massachusetts 02109 Fax: 617-526-5000