UNITED STATES SECURITIES AND EXCHANGE COMMISSION October 19, 2009

ORDER GRANTING CONFIDENTIAL TREATMENT UNDER THE SECURITIES EXCHANGE ACT OF 1934

Idera Pharmaceuticals, Inc.

File No. 001-31918 - CF#23304

Idera Pharmaceuticals, Inc. submitted an application under 24b-2 requesting confidential treatment for information it excluded from the Exhibits to a Form 10-K filed on March 11, 2009 and amended on October 9, 2009.

Based on representations by Idera Pharmaceuticals, Inc. that this information qualifies as confidential commercial or financial information under the Freedom of Information Act, 5 U.S.C. 552(b)(4), the Division of Corporation Finance has determined not to publicly disclose it. Accordingly, excluded information from the following exhibit will not be released to the public for the time period specified:

Exhibit 10.55 through December 18, 2017

For the Commission, by the Division of Corporation Finance, pursuant to delegated authority:

Pamela Howell Special Counsel