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January 12, 2017

Ms. Suzanne Hayes
Assistant Director
Office of Health Care and Insurance
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, N.E.
Mail Stop 3561
Washington, D.C. 20549

Re: **Avenue Therapeutics, Inc.**
Comparison of the Form 10-12G filed on January 12, 2017 against the Form 10-12G/A filed on February 18, 2016.
File No. 000-55556

Dear Ms. Hayes:

At the request and on behalf of our client, Avenue Therapeutics, Inc., a Delaware corporation (the "*Company*"), please find enclosed with this letter a courtesy copy of the Company's current General Form for Registering Securities on Form 10-12G, filed on January 12, 2017 (the "*Form 10-12G*") marked against the Company's Amended General Form for Registering Securities on Form 10-12G/A, filed on February 18, 2016 (the "*Form 10-12G/A*").

If you have any questions, comments or informational requests relating to this matter, please do not hesitate to contact me at the telephone number above.

Sincerely,

Mark F. McElreath