

Via Facsimile and U.S. Mail  
Mail Stop 4720

October 15, 2009

Dr. Martine Rothblatt  
Chairman of the Board and Chief Executive Officer  
United Therapeutics Corporation  
1110 Spring Street  
Silver Spring, MD 20910

**Re: United Therapeutics Corporation  
Form 10-K for the Fiscal Year Ended December 31, 2008  
Filed February 26, 2009  
File No. 000-26301**

Dear Dr. Rothblatt:

We have reviewed your August 21, 2009 and September 1, 2009 responses to our August 7, 2009 and August 19, 2009 letters, respectively, and have the following comments. In our comments, we ask you to provide us with information to better understand your disclosure. Where a comment requests you to revise disclosure, the information you provide should show us what the revised disclosure will look like and identify the annual or quarterly filing, as applicable, in which you intend to first include it. If you do not believe that revised disclosure is necessary, explain the reason in your response. After reviewing the information provided, we may raise additional comments and/or request that you amend your filing.

Consolidated Financial Statements  
Consolidated Statements of Cash Flows, page F-7

1. Refer to your response to comment one dated August 21, 2009. As it appears that you included non-cash amounts of \$6.4 million related to construction projects in your 2008 cash flows used in operating and in investing activities, please confirm that you intend to adjust your statements of cash flows to increase your 2008 cash flows used in operating activities and to decrease your 2008 cash flows used in investing activities to remove the effect of these non-cash amounts. Tell us in what filing you intend to first include the adjusted 2008 statement of cash flows and to include these non-cash amounts in the supplemental disclosures required by paragraph 32 of SFAS 95.

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2. Summary of Significant Accounting Policies  
Revenue Recognition  
Remodulin Sale, F-13

2. Please refer to your response to comment one dated September 1, 2009 where you indicate that there is no journal entry required with respect to products damaged during shipment and known to the Company during the period of sale. As it would appear that damaged inventory is not saleable, please clarify how you recognize the cost of the damaged inventory in your financial statements and in what period these costs are recognized. Further, please refer to your disclosure on page 73; "As such, reserves for exchange rights are not recognized in the period of sale, unless product expiration or damage occurs during shipment and are known to us." It appears to us based on your response that the reason you do not record reserves for exchange rights is because you estimate exchanges to be immaterial. Please revise your disclosure accordingly to clarify.

Notes to the Consolidated Financial Statements  
15. License Agreements  
Eli Lilly and Company, Page F-46

3. In your response to comment two dated August 21, 2009 you indicated that you considered a blockage discount to apply to the shares issued to Lilly of 10%. Please tell us how applying this discount complies with paragraph 27 of SFAS 157.

\* \* \* \*

Please provide us the information requested within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter with your response that keys your response to our comments. Detailed cover letters greatly facilitate our review. Please furnish your letter on EDGAR under the form type label CORRESP.

Please contact Kei Nakada, Staff Accountant, at (202) 551-3659 or Gus Rodriguez, Accounting Branch Chief, at (202) 551-3752, if you have questions regarding these comments. In this regard, do not hesitate to contact me, at (202) 551-3679.

Sincerely,

Jim B. Rosenberg  
Senior Assistant Chief Accountant