February 12, 2007

Mr. John R. Emery Chief Financial Officer, inVentiv Health, Inc. 200 Cottontail Lane Vantage Court North Somerset, NJ 08873

Re: inVentiv Health, Inc.

Form 10-K for the year ended December 31, 2005

Filed March 16, 2006 File No. 000-30318

Dear Mr. Emery:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Daniel L. Gordon Branch Chief