



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

November 22, 2010

Mr. Mark A. Sirgo
President and Chief Executive Officer
BioDelivery Sciences International, Inc.
801 Corporate Center Drive, Suite #210
Raleigh, NC 27607

**Re: BioDelivery Sciences International, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2009
File No. 001-31361**

Dear Mr. Sirgo:

We have completed our review of your filing and do not have any further comments at this time.

Sincerely,

Melissa N. Rocha
Accounting Branch Chief