



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

DIVISION OF  
CORPORATION FINANCE

August 1, 2019

Herm Cukier  
Chief Executive Officer  
BioDelivery Sciences International, Inc.  
4131 ParkLake Avenue, Suite 225  
Raleigh, NC 27612

**Re: BioDelivery Sciences International, Inc.  
Registration Statement on Form S-3  
Filed July 29, 2019  
File No. 333-232880**

Dear Mr. Cukier:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Irene Paik at 202-551-6553 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Healthcare & Insurance

cc: Robert E. Puopolo - Goodwin Procter LLP