Via Facsimile and U.S. Mail Mail Stop 6010

January 4, 2007

Mr. James Meer Senior Vice President, Chief Financial Officer and Treasurer Columbia Laboratories, Inc. 354 Eisenhower Parkway, Plaza 1, 2nd Floor Livingston, NJ 07039

> Re: Form 10-K for the Fiscal Year Ended December 31, 2005 File No. 001-10352

Dear Mr. Meer:

We have completed our review of your Form 10-K and have no further comments at this time.

Sincerely,

Joseph J. Roesler Accounting Branch Chief