

Mail Stop 6010

April 25, 2008

Richard Chin, M.D.  
President and Chief Executive Officer  
Oxigene, Inc.  
230 Third Avenue  
Waltham, MA 02451

**Re: Oxigene, Inc.  
Preliminary Proxy Statement on Schedule 14A  
Filed April 18, 2008  
File No. 0-21990**

Dear Dr. Chin:

We have completed our review of your proxy statement and have no further comments at this time. Please contact Song Brandon at (202) 551-3621 with any questions.

Sincerely,

Jeffrey Riedler  
Assistant Director

cc: Megan N. Gates, Esq.  
Asya S. Alexandrovich, Esq.  
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
One Financial Center  
Boston, MA 02111