

IMMUNOGEN, INC.  
830 Winter Street  
Waltham, MA 02451

May 9, 2017

**Via EDGAR**

Securities and Exchange Commission  
Division of Corporation Finance  
100 F Street, N.E.  
Washington, D.C. 20549

Attention: Suzanne Hayes, Assistant Director  
Ada Sarmento

Re: **ImmunoGen, Inc.**  
**Registration Statement on Form S-3**  
**Filed on March 3, 2017, as amended on May 5, 2017**  
**File No. 333-216438**

Ladies and Gentlemen:

Pursuant to Rule 461 of the Rules and Regulations promulgated under the Securities Act of 1933, as amended, ImmunoGen, Inc. (the "Company") hereby requests that the effectiveness of the above-captioned Registration Statement on Form S-3 be accelerated to Thursday, May 11, 2017, at 5:00 p.m., EDT, or as soon as thereafter practicable.

Any questions should be addressed to Daniel T. Kajunski, Esq., at Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., One Financial Center, Boston, MA 02111, telephone (617) 348-1715.

Thank you for your attention to this matter.

Very truly yours,

ImmunoGen, Inc.

/s/ Mark J. Enyedy

Mark J. Enyedy  
President and Chief Executive Officer

cc: Securities and Exchange Commission  
Suzanne Hayes, Assistant Director  
Ada Sarmento

ImmunoGen, Inc.  
David B. Johnston  
Craig Barrows

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.  
Daniel T. Kajunski, Esq.

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