October 4, 2022

Reshma Kewalramani Chief Executive Officer and President Vertex Pharmaceuticals Incorporated 50 Northern Avenue Boston, Massachusetts 02210

Re: Vertex

Pharmaceuticals Incorporated

Statement on Schedule 14A

Definitive Proxy

Filed April 7, 2022 File No. 000-19319

Dear Reshma Kewalramani:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance

Disclosure Review Program