

BIOLASE TECHNOLOGY INC

Form RW

June 17, 2008

Biolase Technology, Inc.

4 Cromwell

Irvine, CA 92618

Telephone: (888) 424-6527

Facsimile: (949) 366-3325

June 11, 2008

VIA EDGAR AND OVERNIGHT DELIVERY

Ms. Peggy Fisher

Assistant Director

Division of Corporation Finance

United States Securities and Exchange Commission

100 F Street N.E.

Washington, D.C. 20549

Dear Ms. Fisher:

On November 29, 2005, Biolase Technology, Inc., a Delaware corporation (the Company), filed a Registration Statement on Form S-1 (File No. 333-129995) (together with the exhibits and amendments thereto, the Registration Statement) under the Securities Act of 1933, as amended (the Securities Act), with the Securities and Exchange Commission (the Commission). Pursuant to Rule 477 under the Securities Act, the Company hereby requests that the Commission consent to the withdrawal of the Registration Statement effective as of the date hereof or at the earliest practicable date hereafter. The Company is requesting such withdrawal because it had filed a subsequent Registration Statement on Form S-3 on March 19, 2007 (File No. 333-141417) under the Securities Act that registered a portion of the shares covered by the Registration Statement. With respect to the unregistered portion, the Company is no longer obligated to register those shares. The Registration Statement has not been declared effective by the Commission and no securities have been issued or sold under the Registration Statement. Therefore, withdrawal of the Registration Statement is consistent with the public interest and the protection of investors, as contemplated by Rule 477(a).

Please send copies of the written order granting withdrawal of the Registration Statement to the undersigned at Biolase Technology, Inc., 4 Cromwell, Irvine, California 92618, facsimile number (949) 366-3325, with a copy to the Company's counsel, Latham & Watkins LLP, 650 Town Center Drive, 20th Floor, Costa Mesa, California, 92626, Attn: William Cernius, facsimile number (714) 755-8290.

Please do not hesitate to contact me directly if you have any questions regarding this matter.

Very truly yours,

Biolase Technology, Inc.

By: /s/ Jake St. Philip

Name: Jake St. Philip

Title: Chief Executive Officer