October 26, 2007

Via Fax & U.S. Mail

Mr. Kevin C. Schick Chief Financial Officer CON-WAY INC. 2855 Campus Drive, Suite 300 San Mateo, California 94403

Re: Con-way Inc.

Form 10-K for the year ended December 31, 2006

File No. 1-05046

Dear Mr. Schick:

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

Sincerely,

David R. Humphrey Branch Chief