



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

Mail Stop 3561

February 1, 2010

Via Fax & U.S. Mail

Mr. Stephen L Bruffett
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, 2008
File No. 001-05046**

Dear Mr. Bruffett:

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

Sincerely,

David R. Humphrey
Branch Chief