

Via Facsimile and U.S. Mail  
Mail Stop 6010

July 24, 2006

James H. Bloem  
Chief Financial Officer  
Humana, Inc.  
500 West Main Street  
Louisville, KY 40202

**Re: Humana, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2005  
Filed March 3, 2006  
File No. 001-05975**

Dear Mr. Bloem:

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

Sincerely,

Kevin Woody  
Branch Chief