Via Facsimile and U.S. Mail Mail Stop 6010

October 27, 2006

Mr. Michael W. Bell Executive Vice President and CFO Cigna Corporation Two Liberty Place Philadelphia, Pennsylvania

> Re: Form 10-K for Fiscal Year Ended December 31, 2005 Filed February 23, 2006 File No. 1-08323

Dear Mr. Bell:

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

Sincerely,

Joseph Roesler Accounting Branch Chief