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OFFICE OF INTERNATIONAL
CORPORATE FINANCE

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May 16, 2006

U.S. Securities and Exchange Commission
Division of Corporation Finance
100F Street, NE
Washington, DC 20549
U. S. A.
Attn: Mr. Alan L. Beller

SUPPL

Re: File Number: 82-5233

Dear Mr. Dudek:

Pursuant to Rule 12g3-2(b)(1)(iii) under the Securities Exchange Act of 1934, we, as legal advisers to BELLUNA CO., LTD. (whose file number is 82-5233), enclose herewith the following information:

- Repurchase of Own Shares dated May 15, 2006

Thank you for your attention.

Yours truly,

Seishi Ikeda
Seishi Ikeda

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MAY 23 2006

J THOMSON
FINANCIAL

SI/mt
Enclosure

cc: BELLUNA CO., LTD. (w/o attachment)
THE BANK OF NEW YORK (with attachment)

dlw 5/19

May 15, 2006

Dear Sirs:

Name of Company: BELLUNA CO., LTD.
Code No.: 9997 1st Section of the Tokyo Stock Exchange

Repurchase of Own Shares

(Repurchase of own shares in accordance with Section 2 of Article 165 of the Corporate Law)

At the meeting of Board of Directors held on May 15, 2006, Belluna Co., Ltd. resolved to repurchase of its own shares pursuant to section 2 of article 165 of the Corporate Law.

Description

1. Reason for the repurchase

To enable swift implementation of the Company's capital policies in response to changes in business conditions.

2. Details of the repurchase

- | | |
|---|---------------------------------|
| (1) Type of shares to be repurchased: | Common stock of the Company |
| (2) Total number of shares to be repurchased: | Maximum of 600,000 shares |
| (3) Total costs of shares to be repurchased: | Maximum of ¥1,300 million |
| (4) Period of repurchase: | May, 16, 2006 to March 31, 2007 |

Note: Information as of March 31, 2006

- Total number of outstanding shares without treasury stocks: 25,759,528 shares
- Total number of shares repurchased: 1,242,200 shares

- END -

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