

Mail Stop 3720

June 14, 2006

Via U.S. Mail and Fax (972-819-2314)

Ms. Jana Ahlfinger Bell  
Chief Financial Officer  
EFJ, Inc.  
1440 Corporate Drive  
Irving, TX 75038

**RE: EFJ, Inc.**  
**Form 10-K for the Year ended December 31, 2005**  
**Filed March 9, 2006**  
**File No. 000-21681**

Dear Ms. Bell:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Larry Spigel  
Assistant Director