

December 1, 2006

Mail Stop 4561

Mr. Geraldo Travaglia Filho
Vice-President and Principal Financial Officer
Unibanco-Union of Brazilian Banks S.A.
Unibanco Holdings S.A.
Avenida Eusébio Matoso, 891
05423-901 São Paulo, SP
Brazil

Re: Unibanco-Union of Brazilian Banks S.A.
Unibanco Holdings S.A.
Form 20-F filed June 30, 2006
File No. 1-14640-1

Dear Mr. Filho:

We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

John P. Nolan
Accounting Branch Chief