



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

Mail Stop 4561

August 31, 2006

Jean Dagenais  
Chief Financial Officer  
Clarendon House  
2 Church Street  
Hamilton HM 11  
Bermuda

**Re: NB Finance, LTD.  
Form 20-F for the Fiscal Year Ended December 31, 2005  
File No. 333-49153**

Dear Mr. Dagenais:

We have reviewed your response dated August 16, 2006 to our comment letter dated August 3, 2006. We have completed our review of your Form 20-F and related filings and have no further comments at this time.

Sincerely,

Don Walker  
Senior Assistant Chief Accountant