

**MAIL STOP 3561**

January 5, 2007

Mr. Aristeidis Ioannidis, CFO  
AllShips Ltd.  
Covenant House  
85 Reid Street  
Hamilton, Bermuda HM 12

**Re: AllShips Ltd.  
Form 20-F for Fiscal Year Ended February 28, 2005  
Filed September 30, 2005  
File Number 000-30574**

Dear Mr. Ioannidis:

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

Sincerely,

Terence O'Brien  
Branch Chief, Office of  
Emerging Growth Companies