

Via Facsimile and U.S. Mail  
Mail Stop 6010

January 12, 2006

Mr. Stephen M. Tuuk  
President and Chief Executive Officer  
Professionals Direct, Inc.  
161 Ottawa Avenue, N.W., Suite 607  
Grand Rapids, Michigan 49503

**Re: Professionals Direct, Inc.**  
**Form 10-KSB for fiscal year ended December 31, 2004**  
**Filed March 30, 2005**  
**Schedule 14A**  
**Filed April 19, 2005**  
**File No. 000-49786**

Dear Mr. Tuuk:

We have completed our review of your Form 10-KSB and of your Schedule 14A and have no further comments at this time.

Sincerely,

Jim Atkinson  
Accounting Branch Chief