

Via Facsimile and U.S. Mail  
Mail Stop 6010

January 30, 2007

Timothy Fairbanks  
Chief Financial Officer  
NationsHealth, Inc.  
13630 N.W. 8<sup>th</sup> Street, Suite 210  
Sunrise, FL 33325

**Re: NationsHealth, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2005  
Filed March 31, 2006  
File No. 000-50348**

Dear Mr. Fairbanks:

We have reviewed your December 20, 2006 response to our December 6, 2006 letter and have the following comments. In our comments, we ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

General

1. Please confirm that you will include disclosures in future filings similar to your responses to prior comments one through four.

Notes to Consolidated Financial Statements

Note 4. CIGNA Agreement, page 49

2. Refer to your response to prior comment five. Please tell us your basis under GAAP for recording “direct contract acquisition cost” as an asset for the value of the equity instruments issued to CIGNA in connection with your strategic alliance agreement. Please cite authoritative literature that supports your accounting treatment. Neither EITF 96-18 nor EITF 00-18 to which you refer provide guidance for determining an asset under GAAP. Also, please tell us why you describe this asset as “deferred equity compensation” on your balance sheet as that description does not appear consistent with “direct contract acquisition cost.”

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Timothy Fairbanks  
NationsHealth, Inc.  
January 30, 2007  
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Please respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a letter that keys your response to our comments and provides requested information. Detailed letters greatly facilitate our review. You should furnish the letter to us via EDGAR under the form type label CORRESP.

You may contact Todd Sherman, Staff Accountant, at 202-551-3665 or Don Abbott, Senior Accountant, at 202-551-3608 if you have questions regarding the comments. In this regard, do not hesitate to contact me, at (202) 551-3679.

Sincerely,

Jim B. Rosenberg  
Senior Assistant Chief  
Accountant