

November 8, 2006

Mail Stop 4561

VIA U.S. MAIL AND FAX (952) 591-3865

Mr. David J. Parrin  
Executive Vice President and Chief Financial Officer  
MoneyGram International, Inc.  
1550 Utica Avenue South  
Suite 100  
Minneapolis, Minnesota 55416

Re: **MoneyGram International, Inc.**  
**Form 10-K for the year ended December 31, 2005**  
**Filed March 1, 2006**  
**Response Letters Dated July 18, 2006 and September 29, 2006**  
**File No. 1-31950**

Dear Mr. Parrin:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Joshua S. Forgione  
Assistant Chief Accountant