

Mail Stop 3720

May 4, 2006

Mr. Matthew T. Gibbs  
Chief Financial Officer and Director  
Language Line Holdings, Inc.  
One Lower Ragsdale Drive  
Monterey, CA 93940

**Re: Language Line Holdings, Inc.  
Item 4.01 Form 8-K  
Filed May 4, 2006  
File No. 333-118754**

Dear Mr. Gibbs:

We have reviewed your filing and have the following comment. Where indicated, we think you should revise your document in response to our comment. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comment or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

1. We note that you engaged PricewaterhouseCoopers LLP on May 1, 2006, however your disclosures with regard to consultations with your new accountant only cover the last two fiscal years through April 24, 2006. Please revise your disclosures to cover your last two fiscal years through the date of engagement, as required by Item 304(a)(2) of Regulation S-K.

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As appropriate, please amend your filing and respond to our comment, via EDGAR, within five business days or tell us when you will respond. Please understand that we may have additional comments after reviewing your amendment and responses to our comments.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comment, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comments on your filing.

If you have any questions, please call Kenya Wright Gumbs at (202) 551-3373.

Sincerely,

Robert S. Littlepage  
Accountant Branch Chief