



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE
MAIL STOP 3561

Mail Stop 3561

December 18, 2007

Via Fax and U.S. Mail

Susan Mills
Vice President
Citigroup Mortgage Loan Trust Inc.
390 Greenwich Street, 14th Floor
New York, NY 10013

Re: Citigroup HELOC Trust 2006-NCB1
Form 10-K for the fiscal year ended December 31, 2006
Filed April 2, 2007
Form 10-D for the monthly distribution period from November 1, 2006 to
November 30, 2006
Filed December 21, 2006
File No. 333-131136-03

Dear Ms. Mills:

We have completed our review of your Form 10-K and related filings and, without necessarily concurring with your comment responses, have no further comments at this time.

Sincerely,

Max A. Webb
Assistant Director