DIVISION OF CORPORATION FINANCE

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549-7010

MAIL STOP 3561

February 11, 2009

Ms. Karen E. Gowland Vice President, General Counsel Boise Inc. 1111 West Jefferson Street, Suite 200 Boise, ID 83702-5388

Re: Boise Inc.

Form 10-K

Filed February 21, 2008

File No. 001-33541

Supplemental Response Dated January 22, 2009

Dear Mr. Toeldte:

We have completed our review of your filings and have no further comments at this time.

Sincerely,

Assistant Director

Cc: Craig Walker Fax: (312) 827-8179