

Mail Stop 3561

October 26, 2007

Via Fax & U.S. Mail

Mr. Kevin C. Schick  
Chief Financial Officer  
CON-WAY INC.  
2855 Campus Drive, Suite 300  
San Mateo, California 94403

**Re: Con-way Inc.  
Form 10-K for the year ended December 31, 2006  
File No. 1-05046**

Dear Mr. Schick:

We have completed our review of your Form 10-K and have no further comments at this time.

Sincerely,

David R. Humphrey  
Branch Chief