



DIVISION OF
CORPORATION FINANCE

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

July 1, 2011

Via Fax & U.S. Mail

Mr. Niels M. Johnsen
Chairman and Chief Executive Officer
International Shipholding Corporation
11 North Water Street
Suite 18290
Mobile, Alabama 36602

Re: International Shipholding Corporation
Form 10-K for the year ended December 31, 2010
Filed March 14, 2011
File No. 1-10852

Dear Mr. Johnsen:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings 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. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

Linda Cvrkel
Branch Chief