

Via Facsimile and U.S. Mail
Mail Stop 6010

July 24, 2006

James H. Bloem
Chief Financial Officer
Humana, Inc.
500 West Main Street
Louisville, KY 40202

Re: Humana, Inc.
Form 10-K for Fiscal Year Ended December 31, 2005
Filed March 3, 2006
File No. 001-05975

Dear Mr. Bloem:

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

Sincerely,

Kevin Woody
Branch Chief