

Via Facsimile and U.S. Mail  
Mail Stop 6010

September 12, 2006

Mr. Kriss Cloninger III  
President, Chief Financial Officer and Treasurer  
Aflac Incorporated  
1932 Wynnton Road  
Columbus, Georgia 31999

**Re: Form 10-K for the Fiscal Year Ended December 31, 2005**  
**Filed February 28, 2006**  
**File No. 001-07434**

Dear Mr. Cloninger,

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

Sincerely,

Joseph J. Roesler  
Accounting Branch Chief