

Via Facsimile and U.S. Mail  
Mail Stop 6010

August 21, 2006

Mr. Thomas R. Watjen  
President and Chief Executive Officer  
UnumProvident Corporation  
1 Fountain Square  
Chattanooga, TN 37402

**Re: UnumProvident Corporation**  
**Form 10-K for the Fiscal Year Ended December 31, 2005**  
**Filed March 3, 2006**  
**File No. 001-11294**

Dear Mr. Watjen:

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

Sincerely,

Jim Atkinson  
Accounting Branch Chief