

Via Facsimile and U.S. Mail
Mail Stop 6010

February 27, 2006

Mr. Roy T.K. Thung
President and Chief Executive Officer
Independence Holding Company
96 Cummings Point Road
Stamford, Connecticut 06902

**Re: Independence Holding Company
Form 10-K for Fiscal Year Ended December 31, 2004
Filed March 16, 2005
File No. 001-32244**

Dear Mr. Thung:

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

Sincerely,

Jim Atkinson
Accounting Branch Chief