

Via Facsimile and U.S. Mail  
Mail Stop 4720

April 2, 2010

Ms. Teresa A. Herbert  
Senior Vice President and  
Chief Financial Officer  
Independence Holding Company  
96 Cummins Point Road  
Stamford, Connecticut 06902

**Re: Independence Holding Company  
Form 10-K for the Year Ended December 31, 2008  
Schedule 14A  
File No. 001-32244**

Dear Ms. Herbert:

We have completed our review of your Form 10-K and of your Schedule 14A and have no further comments at this time.

Sincerely,

Gus Rodriguez  
Accounting Branch Chief