



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549-7010

Mail Stop 7010

March 28, 2007

via U.S. mail and facsimile

Jean Bernhard Buttner
Chairman & Chief Executive Officer
Value Line, Inc.
220 East 42nd Street
New York, New York 10017-5891

**RE: Value Line, Inc.
Form 10-K for the Fiscal Year Ended April 30, 2006
Filed July 28, 2006
File No. 0-11306**

Dear Ms. Buttner:

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

If you have any further questions regarding our review of your filings, please direct them to Tracey Houser, Staff Accountant, at (202) 551-3736, or in her absence, Al Pavot at (202) 551-3738 or me at (202) 551-3355.

Sincerely,

Terence O'Brien
Accounting Branch Chief