

Via Facsimile and U.S. Mail  
Mail Stop 6010

November 6, 2006

William J. Gedwed  
President and Chief Executive Officer  
HealthMarkets, Inc.  
9151 Grapevine Highway  
North Richland Hills, Texas 76180

**Re: HealthMarkets, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2005**  
**Filed March 14, 2006**  
**File Number: 001-14953**

Dear Mr. Gedwed:

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

Sincerely,

Jim Atkinson  
Accounting Branch Chief