

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