

Via Facsimile and U.S. Mail  
Mail Stop 6010

October 28, 2008

Mr. Philip Rydzewski  
SVP and CAO  
Healthmarkets, Inc.  
9151 Boulevard 26  
North Richland Hills, TX 76180

**Re: Healthmarkets, Inc.**  
**Form 10-Q for the Quarter Ended June 30, 2008**  
**File No. 001-14953**

Dear Mr. Rydzewski:

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

Sincerely,

Gus Rodriguez  
Accounting Branch Chief