

January 28, 2008

Mail Stop 3561

*By U.S. Mail and facsimile to (954) 524-9185*

Mr. Charles Fabrikant  
Chief Executive Officer  
Seacor Holdings Inc.  
2200 Eller Drive  
Fort Lauderdale, FL 33316

**Re: Seacor Holdings Inc.  
Definitive 14A  
Filed April 13, 2007  
File No. 001-12289**

Dear Mr. Fabrikant:

We have completed our review of your executive compensation and related disclosure, and we have no further comments at this time.

Please note that the company is responsible for the adequacy and accuracy of the disclosure in its filing. We are not approving any proposed disclosure you may have included in your response letter or any disclosure you include in your future filings in response to our comments.

If you have any further questions regarding our review of your filing, please call me at (202) 551-3314.

Sincerely,

Daniel Morris  
Attorney-Advisor