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April 9, 2007

U.S. Securities and Exchange Commission
 Division of Corporation Finance
 100F Street, NE
 Washington, DC 20549
 U. S. A.
 Attn: Mr. Alan L. Beller

SUPPL

Re: File Number: 82-5233

Dear Mr. Beller:

Pursuant to Rule 12g3-2(b)(1)(iii) under the Securities Exchange Act of 1934, we, as legal advisers to BELLUNA CO., LTD. (whose file number is 82-5233), enclose herewith the following information:

- Repurchase of Own Shares dated April 9, 2007

Thank you very much for your attention.

Yours truly,

Seishi Ikeda
 Seishi Ikeda

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SI/mt
Enclosure

cc: BELLUNA CO., LTD. (w/o attachment)
 THE BANK OF NEW YORK (with attachment)

Ikeda 4/11/07

April 9, 2007

Dear Sirs:

Name of Company: BELLUNA CO., LTD.

Code No.: 9997 1st Section of the Tokyo Stock Exchange

Repurchase of Own Shares

(Repurchase of own shares in accordance with Section 2 of Article 165 of the Corporate Law)

At the meeting of Board of Directors held on April 9, 2007, Belluna Co., Ltd. resolved to repurchase of its own shares pursuant to section 2 of article 165 of the Corporate Law.

Description

1. Reason for the repurchase

To enable swift implementation of the Company's capital policies in response to changes in business conditions.

2. Details of the repurchase

- | | |
|---|----------------------------------|
| (1) Type of shares to be repurchased: | Common stock of the Company |
| (2) Total number of shares to be repurchased: | Maximum of 1,000,000 shares |
| (3) Total costs of shares to be repurchased: | Maximum of ¥ 1,800 million |
| (4) Period of repurchase: | April 10, 2007 to March 31, 2008 |

Note: Information as of March 31, 2007

- Total number of outstanding shares without treasury stocks: 56,592,274 shares
- Total number of shares repurchased: 3,838,305 shares

- END -

END