

October 31, 2005

Mr. Jonathan G. Katz
Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-9303

Re: Revisions to Accelerated Filer Definition and Accelerated Deadlines for Filing Periodic Reports, Release Nos. 33-8617; 34-52491; File No. S7-08-05

Dear Mr. Katz:

Torchmark Corporation ("Torchmark") welcomes the opportunity to respond to the Securities and Exchange Commission's (the "Commission's") request for comments on the above-referenced proposed rule File No. S7-08-05. Torchmark is a Delaware insurance holding company with life, health and accident insurance subsidiaries domiciled in Alabama, Delaware, Missouri, Texas, Indiana and New York. Torchmark has filed Forms 10-K and 10-Q since the Company's December 1980 listing on the New York Stock Exchange and will qualify as a well known seasoned issuer ("WKSI") under the Securities Act changes to be implemented December 1, 2005.

Torchmark acknowledges its obligation and responsibility to provide clear, accurate and timely information to its regulators, shareholders and the markets in general. All parties involved would agree that the emphasis is and should be on broad quality disclosure. We believe, however, that the proposed revised accelerated filing deadlines, particularly the 60 day deadline for Form 10-K, will diminish the quality of disclosures and result in increased costs while not providing significant corresponding benefits to investors.

Technology does allow us to rapidly accumulate and communicate vast amounts of financial and other data necessary for our many constituent groups. Technology, however, has not reduced and cannot substitute for the time needed to review that data and perform the essential thoughtful reflection and considered analysis required to prepare meaningful disclosures based upon the data. As the trend to increasingly complex additional financial and legal disclosures continues, more time and analysis on the part of Company management, the Audit Committee and the external auditors is and will be required to produce disclosures and filings that meet the Commission's directives, our own Torchmark standards and the needs of investors. Furthermore, the increased importance of Form 10-K and 10-Q disclosures going forward in securities offerings of a "WKSI" makes even more critical the reflective analysis and completeness of those disclosures as they are seen by new investors.

Torchmark's insurance subsidiaries prepare and file separate annual and quarterly financial reports and disclosures with state insurance regulators based upon statutory accounting practices while Torchmark makes disclosures and filings based upon GAAP with the Commission. The preparation and analysis involved in these statutory and GAAP disclosures are sometimes substantially different but both have to be prepared and evaluated in large part by the same group of persons. Currently, there is additional time between the annual statutory filing deadlines (February 28) and the Commission's Form 10-K deadline (March 15). This time which allows for additional review and analysis resulting in quality disclosures will be lost if the 60 day Form 10-K filing deadline is adopted as proposed.

It is for these reasons that Torchmark believes that the Commission should not accelerate the current due dates for Form 10-K and Form 10-Q.

Very truly yours,

Carol A. McCoy

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