Via Facsimile and U.S. Mail Mail Stop 6010

October 15, 2007

Mr. John C. Pintozzi Vice President and Chief Financial Officer Allstate Life Insurance Company 3100 Sanders Road Northbrook, Illinois 60062

Re: Allstate Life Insurance Company Form 10-K for Fiscal Year Ended December 31, 2006 Filed on March 13, 2007 Form 8-K dated April 23, 2007 Filed on April 23, 2007 File No. 000-31248

Dear Mr. Pintozzi:

We have completed our review of your Forms 10-K and 8-K and have no further comments at this time.

Sincerely,

Joel Parker Accounting Branch Chief