CLEVELAND-CLIFFS INC

GEORGE W. HAWK, JR.

GENERAL COUNSEL AND SECRETARY

Direct: (216) 694-5446 Fax: (216) 694-6741 gwhawk@cleveland-cliffs.com

February 3, 2006

Securities and Exchange Commission 100 F Street, N.E. Washington, D.C. 20549-7010 Attention: April Sifford Accounting Branch Chief Division of Corporation Finance

Re: Cleveland-Cliffs Inc Form 10-K for the fiscal year ended December 31, 2004 Filed February 22, 2005 File No. 1-08944

Dear Ms. Sifford:

Reference is made to your letter, dated January 24, 2006, that sets forth the sc"

a year." Therefore, the investments in auction rate securities were classified as current assets because the investments in auction rate securities were reasonably expected to be realized in cash within one year. Our investments in ARS at December 31, 2004, were fully liquidated in the first quarter of 2005.

Please contact the undersigned at (216) 694-5446 if you have any further questions regarding this filing. Thank you for your attention to this matter.

Very truly yours,

/s/ George W. Hawk

George W. Hawk General Counsel and Secretary

cc: Gary Newberry, U.S. Securities and Exchange Commission Sandra Eisen, U.S. Securities and Exchange Commission Donald J. Gallagher, Cleveland-Cliffs Inc David P. Porter, Jones Day