

January 23, 2008

Ms. Jennifer Gowetski  
Attorney-Advisor  
Division of Corporation Finance  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549

Re: Rayonier Inc. Definitive 14A  
Filed April 9, 2007  
File No. 001-06780

Dear Ms. Gowetski:

This will confirm our discussion of this afternoon. Going forward, we will disclose the specific companies comprising any peer groups utilized for purposes of benchmarking compensation levels.

Sincerely,  
/s/W. Edwin Frazier, III

cc: L. M. Thomas