



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

January 6, 2015

Via E-mail

Frank J. Sodaro  
Senior Vice President and Chief Financial Officer  
Kemper Corporation  
One East Wacker Drive  
Chicago, Illinois 60601

**Re: Kemper Corporation**  
**Form 10-K for the Fiscal Year Ended December 31, 2013**  
**Filed February 14, 2014**  
**File No. 001-18298**

Dear Mr. Sodaro:

We have reviewed your December 17, 2014 response to our December 3, 2014 letter and have the following comment.

Please respond to this letter within 10 business days by providing the requested information or by advising us when you will provide the requested response. Please furnish us a letter on EDGAR under the form type label CORRESP that keys your response to our comment.

After reviewing the information you provide, we may have additional comments and/or request that you amend your filings.

Notes to Consolidated Financial Statements

Note 2. Summary of Significant Accounting Policies and Accounting Changes

Insurance Reserves, page 74

1. Please refer to your response to our prior comment two.
  - Regarding the first bullet, provide us disclosure to be included herein in future periodic reports that indicates how you estimate IBNR and that your method does not use the Death Master File. Tell us your understanding as to industry practice for using the Death Master File to identify potentially deceased insureds and determining IBNR liability, and why you believe your method of estimating this liability results in a better estimate than one that uses the Death Master File.
  - Regarding the fourth bullet, provide us disclosure to be included in Note 23 in future periodic reports that further explains the basis for your inability to estimate the amount of loss or range that you would recognize if the "Life Companies" were subjected to "such requirements on a retroactive basis." In this regard, it is not clear why you are not able to make a reasonable estimate as, although you are not legally required to use the Death Master File, you do not appear to be precluded from doing so.

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January 6, 2015  
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Please contact me at (202) 551-3679 if you have questions regarding the comment.

Sincerely,

/s/ Jim B. Rosenberg

Jim B. Rosenberg  
Senior Assistant Chief Accountant