Mr. C.E. Andrews Executive Vice President, Finance SLM Corporation 12061 Bluemont Way Reston, Virginia 20190

SLM Corporation Re:

Form 10-K for the fiscal year ended

December 31, 2004

Forms 10-Q for quarterly periods ended

March 31, 2005 and June 30, 2005

File No. 001-13251

Dear Mr. Andrews:

We have reviewed your response letter dated October 3, 2005 have considered the supplemental information provided by the company. We have the following additional comment.

Form 10-K for the fiscal year ended December 31, 2004 Alternative Performance Measures, pages 61-64

1. We note your supplemental response to comment 1 of our letter dated September 19, 2005. In future filings, please do not use

title "core cash" measures in your disclosures. Reference to cash performance measures may be confusing to investors since your non-GAAP measure does not appear to represent cash flows or a liquidity measure.

Please respond to this comment within ten business days or tell us when you will respond. You may contact Chris Harley at (202) 551-

3695 or me at (202) 551-3449 if you have questions regarding this

comment on the financial statements and related matters.

Sincerely,

Joyce Sweeney Branch Chief

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