



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

DIVISION OF  
CORPORATION FINANCE

Via Facsimile and U.S. Mail

November 4, 2010

Mr. J. Brian Palmer  
Vice President and Chief Accounting Officer  
White Mountains Insurance Group, Ltd.  
265 Franklin Street, 5<sup>th</sup> Floor  
Boston, Massachusetts 02110

**Re: White Mountains Insurance Group, Ltd.  
Form 10-K for the Fiscal Year Ended December 31, 2009  
File No. 001-8993**

Dear Mr. Palmer:

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

Sincerely,

Melissa Rocha  
Accounting Branch Chief