Via Facsimile and U.S. Mail Mail Stop 6010

August 1, 2006

Mr. Eugene G. Ballard Senior Vice President, Chief Financial Officer, and Treasurer W.R. Berkley Corporation 475 Steamboat Road Greenwich, CT 06830

Re: Form 10-K for the Fiscal Year Ended December 31, 2005 Filed March 13, 2006

File No. 001-15202

Dear Mr. Ballard,

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

Sincerely,

Joseph J. Roesler Accounting Branch Chief