Via Facsimile and U.S. Mail Mail Stop 6010

January 8, 2008

Mr. Joseph S. De Vita Senior Vice President, Chief Financial Officer and Assistant Secretary SeaBright Insurance Holdings, Inc. 2101 4th Avenue, Suite 1600 Seattle, Washington 98121

Re: SeaBright Insurance Holdings, Inc. Form 10-K for Fiscal Year Ended December 31, 2006 Filed on March 16, 2007 File No. 000-51124

Dear Mr. De Vita:

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

Sincerely,

Joel Parker Accounting Branch Chief