

Mail Stop 6010  
Via Facsimile and U.S. Mail

March 17, 2008

Mr. Kevin R. Callahan  
Chairman and Chief Executive Officer  
Affirmative Insurance Holdings, Inc.  
4450 Sojourn Drive, Suite 500  
Addison, Texas 75001

**Re: Affirmative Insurance Holdings, Inc.  
Form 10-K for fiscal year ended December 31, 2006  
File No. 000-50795**

Dear Mr. Callahan:

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

Sincerely,

Carlton E. Tartar  
Branch Chief