

Mail Stop 4720

August 11, 2009

Mr. Michael McClure  
Executive Vice President and Chief Financial Officer  
Affirmative Insurance Holdings, Inc.  
4450 Sojourn Drive  
Suite 500  
Addison, TX 75001

**Re: Affirmative Insurance Holdings, Inc.  
Form 10-K for the Year Ended December 31, 2007  
Filed March 17, 2008  
Definitive Proxy Statement on Schedule 14A  
Filed April 29, 2008  
Form 10-Q for the Quarter Ended June 30, 2008  
Filed August 8, 2008  
File No. 000-50795**

Dear Mr. McClure:

We have completed our review of the above filings and have no further comments at this time.

Sincerely,

Carlton E. Tartar  
Accounting Branch Chief