



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

DIVISION OF
CORPORATION FINANCE

December 13, 2010

Randolph L. Hutto
General Counsel
American Safety Insurance Holdings, Ltd.
31 Queen Street
2nd Floor
Hamilton, Bermuda HM11

**Re: American Safety Insurance Holdings, Ltd.
Form 10-K for the Fiscal Year Ended December 31, 2009
Filed March 16, 2010
Form 10-K/A filed April 29, 2010
Form 10-Q for the Quarterly Period ended June 30, 2010
Filed August 9, 2010
File No. 001-14795**

Dear Mr. Hutto:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Jeffrey Riedler
Assistant Director

cc: Brinkley Dickerson, Esq.
Troutman Sanders LLP
600 Peachtree Street, NE Suite 5200
Atlanta, Georgia 30308-2216