

Via Facsimile and U.S. Mail
Mail Stop 6010

July 15, 2008

Brian W. Nocco
Executive Vice President and Chief Financial Officer
XL Capital Ltd
XL House
One Bermudiana Road
Hamilton, Bermuda HM 11

Re: XL Capital Ltd
Form 10-K for the Fiscal Year Ended December 31, 2007
Filed February 29, 2008
File Number: 001-10804

Dear Mr. Nocco:

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

Sincerely,

Joel Parker
Accounting Branch Chief