

Via Facsimile and U.S. Mail  
Mail Stop 4720

October 28, 2009

Mr. 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 Year Ended December 31, 2008  
Filed on March 2, 2009**

**Schedule 14A  
Filed on March 9, 2009  
File No. 001-10804**

Dear Mr. Nocco:

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

Sincerely,

Jeffrey P. Riedler  
Assistant Director