Via Facsimile and U.S. Mail Mail Stop 6010

January 25, 2008

Mr. Richard H. Smith Chief Executive Officer and Chairman First Mercury Financial Corporation 29621 Northwestern Hwy PO Box 5096 Southfield, MI 48043

Re: First Mercury Financial Corporation Form 10-K for the Year Ended December 31, 2006 Filed March 15, 2007 File No. 001-33077

Dear Mr. Smith:

We have completed our review of your Form 10-K for the year ended December 31, 2006 and have no further comment at this time.

Sincerely,

Jim Atkinson Accounting Branch Chief