



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 3720

May 20, 2008

Ms. Jana Ahlfinger Bell  
Chief Financial Officer  
EFJ, Inc.  
1440 Corporate Drive  
Irving, TX 75038  
Facsimile: (972) 819-2314

**RE: EFJ, Inc.**  
**Form 10-K for the year ended December 31, 2007**  
**Filed March 13, 2008**  
**File No. 0-21681**

Dear Ms. Bell:

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

Sincerely,

/s/ Robert Bartelmes  
Senior Financial Analyst