

Via Facsimile and U.S. Mail  
Mail Stop 4720

October 15, 2009

Frank H. Freund  
Senior Executive Vice President, Treasurer,  
and Chief Financial Officer  
American Physicians Capital, Inc.  
1301 North Hagadorn Road  
East Lansing, MI 48823

**Re: American Physicians Capital, Inc.  
Form 10-K for the Year Ended December 31, 2008  
Form 10-Q for the Quarterly Period Ended March 31, 2009  
File No. 000-32057**

Dear Mr. Freund:

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

Sincerely,

Joel Parker  
Accounting Branch Chief