



DIVISION OF
CORPORATION FINANCE

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

February 8, 2011

By U.S. Mail and Facsimile to: (858) 756 - 8301

John M. Eggemeyer
Chief Executive Officer
White River Capital, Inc.
6051 El Tordo
P.O. Box 9876
Rancho Santa Fe, California 92067

Re: White River Capital, Inc.
Annual Report on Form 10-K for the fiscal year ended December 31, 2009
Quarterly Report on Form 10-Q for the quarters ended March 31, 2010,
June 30, 2010 and September 30, 2010
Filed March 15, 2010, May 11, 2010, August 6, 2010 and November 12, 2010
File No. 001-33257

Dear Mr. Eggemeyer:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Christian Windsor
Senior Attorney