

Mail Stop 6010

January 12, 2009

Susan B. Comparato  
President, Acting Chief Executive Officer  
and General Counsel  
Syncora Holdings Ltd.  
Canon's Court, 22 Victoria Street  
Hamilton, Bermuda HM 11

**Re: Syncora Holdings Ltd.  
Preliminary Proxy Statement on Schedule 14A,  
Filed on December 17, 2008,  
as amended on December 31, 2008  
File Number 001-32950**

Dear Ms. Comparato:

We have completed our review of your preliminary proxy statement on Schedule 14A and have no further comments at this time.

Sincerely,

Jeffrey P. Riedler  
Assistant Director

cc: Mariana Franca Pereira  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022