



DIVISION OF  
CORPORATION FINANCE

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

May 15, 2019

Guy Bowker  
Chief Financial Officer  
Enstar Group LTD  
Windsor Place, 3rd Floor  
22 Queen Street  
Hamilton HM JX, Bermuda

**Re: Enstar Group Limited**  
**Form 10-K for the fiscal year ended December 31, 2018**  
**Filed March 1, 2019**  
**File No. 001-33289**

Dear Mr. Bowker:

We have limited our review of your filing to the financial statements and related disclosures and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to the comment within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comment applies to your facts and circumstances, please tell us why in your response.

After reviewing your response to the comment, we may have additional comments.

Form 10-K for fiscal year ended December 31, 2018

Notes to Consolidated Financial Statements

10. Losses and Loss Adjustment Expenses

Loss Development Information

Disclosures of Incurred and Paid Loss Development, IBNR, Claims Counts and Payout Percentages, page 182

1. Please tell us how you reflect:

- commutations and buy-backs; and
- inter-company reinsurance that is eliminated in consolidation such as the "Starstone Intra-group cessions"

for the periods presented within an accident year (or years in the case of 2008 and prior) in

the incurred loss and cumulative paid loss and allocated loss adjustment expense, net of reinsurance tables. In your response also address the following:

- the reason for the significant decrease in the 2008 and prior accident years in the incurred loss and allocated loss adjustment expense, net of reinsurance table during the year of acquisition for Business Acquired and Contracts Incepting in the Year Ended December 31, 2010;
- the reason for the significant decrease in the 2008 and prior accident years in the incurred loss and allocated loss adjustment expense, net of reinsurance table from the year of acquisition through 2018 for Business Acquired and Contracts Incepting in the Year Ended December 31, 2011 and December 31, 2015;
- the reason the cumulative paid losses and allocated loss adjustment expenses, net of reinsurance decreases in the 2008 and prior accident years from 2013 to 2014 for Business Acquired and Contracts Incepting in the Year Ended December 31, 2011; and
- the reason Annual Percentage Payout of Incurred Losses since Year of Acquisition, Net of Reinsurance is shown in parentheses for certain years for the 2011 year of acquisition.

In closing, we remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

You may contact Frank Wyman at 202-551-3660 or Jim Rosenberg at 202-551-3679 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Healthcare & Insurance