

Mail Stop 4720

December 3, 2009

*By US Mail and facsimile to (215) 864-1758*

Gerard P. Cuddy  
President and Chief Executive Officer  
Beneficial Mutual Bancorp, Inc.  
510 Walnut Street  
Philadelphia, PA 19106

**Re: Beneficial Mutual Bancorp, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2008  
Filed March 27, 2009  
File No. 001-33476**

Dear Mr. Cuddy:

We have completed our review of your Form 10-K for fiscal year ended December 31, 2008 and related filings and have no further comments at this time.

Sincerely,

Justin Dobbie  
Attorney Advisor