



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

DIVISION OF
CORPORATION FINANCE

July 20, 2017

Via E-mail

Michael J. McGuire
Chief Executive Officer
Blue Capital Reinsurance Holdings Ltd.
Waterloo House
100 Pitts Bay Road
Pembroke, Bermuda HM 08

**Re: Blue Capital Reinsurance Holdings Ltd.
Form 10-K for the Fiscal Year Ended December 31, 2016
Filed March 1, 2017
File No. 1-36169**

Dear Mr. McGuire:

We refer you to our comment letter dated July 7, 2017, regarding business contacts with Sudan and Syria. We have completed our review of this subject matter. 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.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief
Office of Global Security Risk

cc: Suzanne Hayes
Assistant Director
Division of Corporation Finance