

Via Facsimile and U.S. Mail  
Mail Stop 6010

January 25, 2007

Mr. Bruce G. Kelley  
President and Chief Executive Officer  
EMC Insurance Group, Inc.  
717 Mulberry Street  
Des Moines, Iowa 50309

**Re: EMC Insurance Group Inc.**  
**Form 10-K for Fiscal Year Ended December 31, 2005**  
**Filed on March 16, 2006**  
**File No. 000-10956**

Dear Mr. Kelley:

We have completed our review of your Form 10-K and have no further comments at this time.

Sincerely,

Jim Atkinson  
Accounting Branch Chief