



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

DIVISION OF
CORPORATION FINANCE

September 23, 2010

J. Allen Fine
Chairman and CEO
Investors Title Company
121 North Columbia Street
Chapel Hill, North Carolina 27514

Re: Investors Title Company
Form 10-K for the fiscal year ended December 31, 2010
Filed March 15, 2010
File No. 0-11774

Dear Mr. Fine:

We have completed our review of your Form 10-K and do not have any further comments at this time.

Sincerely,

Gus Rodriguez
Branch Chief