

Via Facsimile and U.S. Mail  
Mail Stop 6010

February 26, 2009

Marc J. Zimmermann  
Chief Financial Officer  
American Physicians Service Group, Inc.  
1301 Capital of Texas Highway, Suite C-300  
Austin, Texas 78746

**Re: American Physicians Service Group, Inc.  
Form 10-K for the Year Ended December 31, 2007  
Filed March 13, 2008  
Form 10-Q for the Quarterly Period Ended September 30, 2008  
Filed November 3, 2008  
File No. 001-31434**

Dear Mr. Zimmermann:

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

Sincerely,

Gus Rodriguez  
Accounting Branch Chief