

Via Facsimile and U.S. Mail  
Mail Stop 6010

April 15, 2008

Spencer LeRoy III, Esquire  
Senior Vice President, General Counsel and Secretary  
Old Republic International Corporation  
307 North Michigan Avenue  
Chicago, Illinois 60601-5382

**Re: Old Republic International Corporation**  
**Form 10-K filed February 26, 2008**  
**Form 10-K/A filed March 31, 2008**  
**File No. 001-10607**

Dear Mr. LeRoy:

We have reviewed your filings and have the following comments. Where indicated, we think you should revise your Form 10-K/A in response to these comments. If you disagree, we will consider your explanation as to why our comments are inapplicable or a revision is unnecessary. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or on any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Form 10-K/A, filed March 31, 2008

1. We note that this Form 10-K/A was not signed on behalf of the company by a duly authorized representative of the company. See Rule 12b-15 of the Securities and Exchange Act and Rule 302(a) of Regulation S-T. Please amend this filing accordingly.

\* \* \* \*

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Please amend your Form 10-K/A and respond to these comments within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter with your amendment that keys your responses to our comments and provide any requested information. Detailed letters greatly facilitate our review. Please file your letter on EDGAR under the form type label CORRESP.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comments, please provide, in your letter, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filing or in response to our comment on your filing.

Please contact Jennifer Riegel, Staff Attorney at (202) 551-3575, Suzanne Hayes, Branch Chief at (202) 551-3675 or me at (202) 551-3715 with any questions.

Sincerely,

Jeffrey Riedler  
Assistant Director