Mail Stop 3561

August 3, 2007

Via U.S. Mail and Facsimile

Morten Arntzen Chief Executive Officer Overseas Shipholding Group, Inc. 666 Third Avenue New York, New York 10017

RE: Overseas Shipholding Group, Inc.

Form 10-K for the fiscal year ended December 31, 2006

File No. 001-06479

Dear Mr. Arntzen:

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

Sincerely,

Linda Cvrkel Branch Chief

Via facsimile: Myles R. Itkin, Chief Financial Officer

Morten Arntzen Overseas Shipholding Group, Inc. Page 2