

Via Facsimile and U.S. Mail
Mail Stop 6010

October 30, 2006

Mr. Steve E. Fass
President and Chief Executive Officer
White Mountains Insurance Group, Ltd.
Plaza 5 Harborside Financial Center Plaza
Jersey City, NJ 07311-1114

Re: White Mountains Insurance Group, Ltd.
Form 10-K for Fiscal Year Ended December 31, 2005
Filed on March 7, 2006
File No. 001-08993

Dear Mr. Fass:

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

Sincerely,

Jim Atkinson
Accounting Branch Chief