

Mail Stop 4561

January 15, 2008

Mr. Nicholas K. Fortson
Chief Financial Officer
University Bancorp, Inc.
2015 Washtenaw Avenue
Ann Arbor, Michigan 48104

**RE: University Bancorp, Inc.
Form 10-KSB for the Fiscal Year Ended December 31, 2006
Filed April 16, 2007
File No. 000-16023**

Dear Mr. Fortson:

We have reviewed your response letter dated December 26, 2007 and have considered the supplemental information provided by the company. We have the following comment.

Form 10-KSB for the Fiscal Year ended December 31, 2006
Form 10-QSBs for the Quarterly Periods Ended March 31, 2007 and June 30, 2007

Please amend the Form 10-KSB and Form 10-QSBs to reflect the draft changes to the disclosures.

Please respond to this comment within 10 business days or tell us when you will respond. You may contact Chris Harley, Staff Accountant, at (202) 551-3695 or me at (202) 551-3697 if you have questions.

Sincerely,

Benjamin Phippen
Reviewing Accountant