

Via Facsimile and U.S. Mail
Mail Stop 6010

June 4, 2007

Robert F. Orlich
President and Chief Executive Officer
Transatlantic Holdings, Inc.
80 Pine Street
New York, New York 10005

Re: Transatlantic Holdings, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2006
Filed February 28, 2007
File Number: 001-10545

Dear Mr. Orlich:

We have limited our review of your filing to the issues we have addressed in our comments. In our comments, we ask you to provide us with additional information so we may better understand your disclosures. 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.

Management's Discussion and Analysis of Financial Condition and Results of Operations, page 31

Critical Accounting Estimates, page 35

Loss Reserves, page 35

1. We believe your disclosure in the Critical Accounting Estimates section of MD&A regarding the estimation of the reserve for loss and loss adjustment expenses could be improved to better explain the judgments and uncertainties surrounding this estimate and the potential impact on your financial statements. We believe in order to meet the principal objectives of MD&A this disclosure should enable the investor to understand 1) management's method for establishing the estimate; 2) whether and if so to what extent and why management has

adjusted their assumptions used to determine the estimate from the assumptions used in the immediately preceding period and 3) the potential variability in the most recent estimate and the impact this variability may have on reported results, financial condition and liquidity. Please keep these points in mind in providing us your responses to comments listed below. Please provide us, in disclosure-type format, the following information for each material line of business and also consider providing any additional information, in disclosure-type format, to achieve this objective.

- a. Please expand your discussion regarding the methods you used to determine your reserve for loss and loss adjustment expense to include the following:
 1. We note your discussion on page 36 related to your longer tail lines of business. Please explain how the methods you use for your short-tail business differ from the methods you use for your long-tail business.
 2. In your discussion of the methodologies utilized on page 37, clarify which methods were used to record your reserves. Include why you selected each methodology over any of the other methodologies and whether the same methodology was used for all periods.
 3. On page 37 you also discuss how the actuarial point estimate is compared against the actual carried reserves. Include a discussion of how you determine that the recorded estimate is more appropriate, what you rely on in this determination, and the amount of the difference.
 4. Describe the method you use to calculate the IBNR reserve for each material line of business. For example, we understand that some companies may calculate this reserve by estimating the ultimate unpaid liability first and then reducing that amount by cumulative paid claims and by case reserves, but there may be other methods as well.
- b. In your discussion of the sensitivity of the reserves to variations in certain assumptions, include a discussion of how these assumptions as of December 31, 2006 are or are not consistent with historical loss reserve development patterns and explain why these assumptions are now appropriate given any potential inconsistency identified.
- c. Your discussion of the impact that changes in prior year reserves had on current operations on page 43 references “greater than expected loss activity” along with a discussion of the years and lines of businesses affected. Discuss the actual factors that resulted in the “greater than expected loss activity” referenced.

12. Stock-Based Compensation Plans, page 79

(c) Compensation to Certain TRH Employees from SICO, page 83

2. Please explain to us why correcting the SICO balance in 2005 directly through retained earnings versus through compensation was appropriate. Provide us your materiality analysis that supports that such charges would not materially affect the

current period. Include any references to the specific paragraphs within the applicable authoritative literature that supports the treatment.

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Please provide us the information requested within 10 business days or tell us when you will provide us with a response. Please furnish a cover letter with your response that keys your response to our comments. Detailed cover letters greatly facilitate our review. Please furnish 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 comments on your filing.

You may contact Vanessa Robertson, Staff Accountant, at (202) 551-3649 or Jim Atkinson, Accounting Branch Chief, at (202) 551-3674 if you have any questions regarding the comments. In this regard, do not hesitate to contact me, at (202) 551-3679.

Sincerely,

Jim B. Rosenberg
Senior Assistant Chief
Accountant