

Via Facsimile and U.S. Mail
Mail Stop 6010

October 20, 2006

Mr. Robert P. Restrepo, Jr.
President and Chief Executive Officer
State Auto Financial Corporation
518 East Broad Street
Columbus, Ohio

**Re: State Auto Financial Corporation
Form 10-K for Fiscal Year Ended December 31, 2005
Filed on March 13, 2006
File No. 000-19289**

Dear Mr. Restrepo:

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

Sincerely,

Joe Roesler
Accounting Branch Chief