

Via Facsimile and U.S. Mail  
Mail Stop 6010

July 15, 2008

Brian W. Nocco  
Executive Vice President and Chief Financial Officer  
XL Capital Ltd  
XL House  
One Bermudiana Road  
Hamilton, Bermuda HM 11

**Re: XL Capital Ltd**  
**Form 10-K for the Fiscal Year Ended December 31, 2007**  
**Filed February 29, 2008**  
**File Number: 001-10804**

Dear Mr. Nocco:

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

Sincerely,

Joel Parker  
Accounting Branch Chief