

Via Facsimile and U.S. Mail  
Mail Stop 4720

August 17, 2009

Donald P. Lofe, Jr.  
Executive Vice President and Chief Financial Officer  
The PMI Group, Inc.  
3003 Oak Road  
Walnut Creek, CA 94597

**Re: The PMI Group, Inc.**  
**Form 10-K for the Fiscal Year Ended December 31, 2008**  
**Filed March 16, 2009**  
**File Number: 001-13664**

Dear Mr. Lofe,

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

Sincerely,

Carlton Tartar  
Accounting Branch Chief