



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

July 22, 2010

John C.R. Hele  
Executive Vice President, Chief  
Financial Officer and Treasurer  
Arch Capital Group Ltd.  
Wessex House  
45 Reid Street  
Hamilton HM 12, Bermuda

**Re: Arch Capital Group Ltd.  
Form 10-K for the Year Ended December 31, 2009  
Definitive Proxy Filed March 25, 2010  
File No. 001-16209**

Dear Mr. Hele:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Joel Parker  
Accounting Branch Chief