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Corporate & Financial Regulation

JAN 13 2012

Pennsylvania  
Insurance Department

Steven Burgess Davis  
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January 10, 2012

Via Electronic and Regular Mail

Mr. Robert E. Brackbill, Jr.  
Chief of Company Licensing Division  
Office of Corporate and Financial Regulation  
Pennsylvania Insurance Department  
1345 Strawberry Square  
Harrisburg, PA 17120

Re: Harleysville/Nationwide Proposed Merger Form A – Harleysville Group, Inc.  
Preliminary Proxy Statement

Dear Mr. Brackbill:

I write this letter in connection with the above-referenced application to advise the Pennsylvania Insurance Department that, on Wednesday, January 4, 2012, Fox Rothschild LLP, legal counsel to Harleysville Group Inc., was notified verbally by the United States Securities and Exchange Commission (the "SEC") that the SEC will not be reviewing the Preliminary Proxy Statement filed by Harleysville Group Inc. on Schedule 14A with the SEC on Friday, December 23, 2011. Therefore, in accordance with Rule 14a-6 under the Securities Exchange Act of 1934, as amended, Harleysville Group Inc. may, at any time, file the Definitive Proxy Statement with SEC and, thereafter, mail the Definitive Proxy Statement to the stockholders of Harleysville Group Inc.

In the event Harleysville Group Inc. needs to make revisions to the Preliminary Proxy Statement prior to filing the Definitive Proxy Statement with the SEC in order to revise its disclosure as a result of any material developments, then Harleysville Group Inc. may file a revised Preliminary Proxy Statement with the SEC and the SEC would have an additional ten (10) day period to review the revised Preliminary Proxy Statement.

If you should have any questions, please do not hesitate to contact me.

Very truly yours,

Steven B. Davis

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