



March 1, 2012

Steven Burgess Davis, Esquire
Stradley Ronon Stevens & Young, LLP
2005 Market Street, Suite 2600
Philadelphia, PA 19103-7018

RE: Merger of Harleysville Mutual Insurance Company with and into
Nationwide Mutual Insurance Company

Dear Mr. Davis;

Thank you for your letter of February 27, 2012, which provided responses to the Pennsylvania Insurance Department's letter of January 30, 2012, concerning the draft proxy statement to the policyholders of Harleysville Mutual Insurance Company ("draft proxy").

The Department has no additional comments on the draft proxy.

In connection to the finalized proxy, please provide as soon as possible:

1. a copy of the exact materials provided policyholders once the distribution of the proxy has been accomplished,
2. an analysis of how many of the total population of policyholders successfully received the proxy materials, and
3. the results of the vote held at the special meeting concerning the policyholder approval of the referenced merger.

Please feel free to contact Robert Brackbill, at 717-783-2143 or rbrackbill@pa.gov should you have any questions concerning this correspondence.

Sincerely,

Stephen J. Johnson
Deputy Insurance Commissioner
Pennsylvania Insurance Department