

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

February 20, 2018

Ciro M. DeFalco Senior Vice President and Chief Financial Officer The Navigators Group, Inc. 400 Atlantic Street Stamford, Connecticut 06901

Re: NAVIGATORS GROUP INC.

Form 10-K for Fiscal Year Ended December 31, 2016 Filed February 17, 2017 File No. 000-15886

Dear Mr. DeFalco:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Division of Corporation Finance Office of Healthcare & Insurance