

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

DIVISION OF CORPORATION FINANCE

July 20, 2017

<u>Via E-mail</u> Michael J. McGuire Chief Executive Officer Blue Capital Reinsurance Holdings Ltd. Waterloo House 100 Pitts Bay Road Pembroke, Bermuda HM 08

> Re: Blue Capital Reinsurance Holdings Ltd. Form 10-K for the Fiscal Year Ended December 31, 2016 Filed March 1, 2017 File No. 1-36169

Dear Mr. McGuire:

We refer you to our comment letter dated July 7, 2017, regarding business contacts with Sudan and Syria. We have completed our review of this subject matter. 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.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief Office of Global Security Risk

cc: Suzanne Hayes Assistant Director Division of Corporation Finance