
A.M. BEST COMPANY

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ARTHUR SNYDER
PRESIDENT AND
CHAIRMAN OF THE BOARD

SECURITIES AND EXCHANGE COMMISSION
RECEIVED

DEC 03 2004

DIVISION OF MARKET REGULATION

December 2, 2004

Mr. Michael A. Macchiaroli
Division of Market Regulation
Securities and Exchange Commission
450 Fifth Street, N.W.
Washington, DC 20549

Re: A.M. Best Company, Inc.

Dear Mr. Macchiaroli:

For the reasons set forth below, we respectfully request that the Division of Market Regulation not recommend enforcement action to the Securities and Exchange Commission if A.M. Best is recognized as a nationally recognized statistical rating organization ("NRSRO") for purposes of applying Rule 15c3-1 under the Securities Exchange Act of 1934, as amended (17 C.F.R. 240.15c3-1).

In support of this request, A.M. Best has supplied you and your staff with a substantial amount of information regarding A.M. Best's qualifications, as outlined in the staff's recognition criteria for NRSROs set-out in Exchange Act Release No. 34-39457 (December 17, 1997). We believe that this information establishes that:

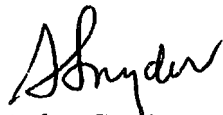
- 1.) A.M. Best is nationally recognized as an issuer of credible ratings by users of securities ratings;
- 2.) The company maintains substantial financial resources to operate independently of the companies it rates, more than ample professional staffing, and an organizational structure that ensures its ability to produce credible ratings;
- 3.) The company has sound procedures and processes in place that enable it to support its ability to produce credible ratings;
- 4.) The company has access to senior management of the companies that it rates on a year-round basis;
- 5.) The company has in place sound procedures to prevent the misuse of Non-Public Information.



The Insurance Information Source

We appreciate your consideration and response to this matter. We would be glad to provide any additional information you may require.

Sincerely,



Arthur Snyder
President and CEO



The Insurance Information Source