



DIVISION OF  
CORPORATION FINANCE

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

November 6, 2007

Mr. J. Brandon Black  
President and Chief Executive Officer  
Encore Capital Group, Inc.  
8875 Aero Drive  
Suite 200  
San Diego, California 92123

**Re: Encore Capital Group, Inc.  
Form 10-K for Fiscal Year Ended December 31, 2006  
Filed February 28, 2007**

**Forms 10-Q for Fiscal Quarter Ended June 30, 2007  
File No. 0-58347**

Dear Mr. Black:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Larry Spigel  
Assistant Director