July 16, 2007

Mark K. Hardwick Chief Financial Officer First Merchants Corporation 200 East Jackson Street Muncie, IN 47305

Re: First Merchants Corporation

Form 10-K for Fiscal Year Ended December 31, 2006

Filed March 16, 2007 File No. 000-17071

Dear Mr. Hardwick:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Kevin W. Vaughn Branch Chief