

# THE STA

## SECURITIES TRANSFER ASSOCIATION, INC.

*Established 1911*

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January 7, 2016

Brent J. Fields, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

**Re: Request for Extension of Comment Period on Release  
Nos. 34-76743, File No. S7-27-15 (“Concept Release”)**

Dear Mr. Fields:

On behalf of the Securities Transfer Association, Inc. (“STA”), I want to thank the Commission and its staff for the effort taken to produce a thoughtful release that is a first step in modernizing the transfer agent rules in light of the many changes in technology, products, and markets that have occurred since 1975. The thorough nature of the Commission’s work is evident in the 170 separate areas of inquiry and over 600 individual questions that are contained in the Concept Release.

As you are aware, the STA is an organization of professional recordkeepers that interact daily with both issuers and their investors. Founded in 1911, the STA’s membership is comprised of over 130 large and small registered transfer agents in the United States and Canada maintaining the records of more than 100 million registered shareholders on behalf of more than 15,000 issuers (from the largest public companies to small privately held companies).

We look forward to sharing our thoughts on many of the issues raised in the Concept Release. However, the STA will need time to solicit the views of its members, develop a consensus on proposed responses, and then circulate draft comments before filing a comment letter with the

Commission. Because of the sheer number of issues presented in the Concept Release, as well as the complex nature of many of these issues, the task of developing informed comments is almost impossible to perform within the 60 day comment period initially proposed - which has been effectively truncated by the holidays.

The STA believes that the detailed questions posed in the Concept Release merit careful analysis and warrant an extension of the comment period. A lengthened timeframe for input will generate more valuable, informed, and constructive commentary. An additional 60 days will be necessary to fully involve our members in the comment process, and to develop thoughtful responses. We believe, however, that the additional time will prove productive in the long run, since it will provide the Commission with the information necessary to more finely tune its future rulemaking efforts.

For these reasons, we respectfully request an extension of the comment period for an additional 60 days.

Sincerely,

A handwritten signature in black ink that reads "Todd J. May". The signature is written in a cursive style with a large, stylized "M" and a horizontal line underneath.

Todd J. May  
President  
The Securities Transfer Association, Inc.

cc: Moshe Rothman, Branch Chief  
Thomas Etter, Special Counsel  
Catherine Whiting, Special Counsel  
Mark Saltzburg, Special Counsel  
Lauren Sprague, Special Counsel  
Elizabeth de Boyrie, Counsel