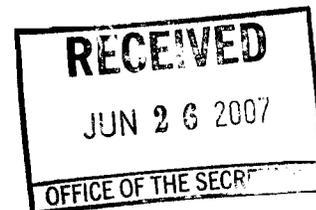


Sr DTC 2006/16 - 23

June 22, 2007

Nancy M. Morris, Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090
USA



Dear Sirs:

**Subject: Securities and Exchange Commission Release No. 34-55816,
File No. R-DTC-2006-16, Notice of Filing of Proposed Rule
Change Amending FAST and DRS Limited Participant
Requirements for Transfer Agents**

Valiant Trust Company ("Valiant"), established in 1993, is a non-deposit taking specialty trust company, focused solely on offering its services to Canadian Issuers. Valiant is an SEC reporting transfer agent and meets NYSE standards to act as Transfer Agent and Registrar for their listed companies. We are supportive of the DRS/FAST initiatives but have concerns about the effect of or the appropriateness of parts of the initiative particularly as they relate to a "small" Transfer Agent based in Canada with only a handful of US listed issuer clients.

The Securities Transfer Association of Canada, of which Valiant is a member, will be submitting its comments and we concur and support its position. We are also a member of the Securities Transfer Association (STA).

Currently, Valiant has 4 Canadian Issuer clients who are interlisted on a US exchange. We sincerely wish to have the ability to service our clients wherever they are listed, however, as a mid-sized transfer agent seeking to expand our business, we find the subject Release No. 34-55816 may adversely influence our decision to offer services to Issuers listed on a US stock exchange due to the costs involved.

In addition, we wish to submit our comments on the following:

Insurance

We are compliant with the insurance requirements of the Securities and Exchange Commission and fail to understand why additional Insurance, at the option of the Depository Trust Company (DTC), would override these requirements.

Further, the costs could escalate due to additional requirements in the future.

Audit

Additional audit requirements imposed by DTC would also require additional resources and costs, which may not be recoverable from our issuers and in many ways duplicate existing audit requirements.

...2/-

Contract Requirements

The contract put forward by DTC, which Valiant would be required to execute, states that to be accepted as a FAST agent the transfer agent must comply with any and all rule or fee changes that DTC may impose from time to time. Signing such a document, which has obligations into the foreseeable future, does not appear to be a good business decision.

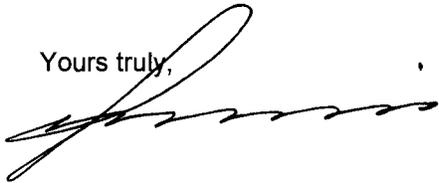
Custodial Services

DTC attempts to place custodial responsibilities on the Transfer Agent without compensation. In Canada a system similar to DRS/FAST is in effect for the Canadian Depository for Securities through CDS & Co. Transfer Agents are not considered custodians.

As an expanding Trust Company we are anxious to fully participate in the corporate services marketplace in both Canada and the US. We trust that we have favorably represented our viewpoint.

Thank you for your consideration and we appreciate the opportunity to participate.

Yours truly,



J. Robert Morris
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