

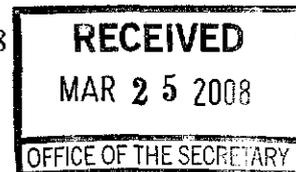


standard registrar

transfer agency, inc.

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

March 20, 2008



RE: Securities and Exchange Commission Release No. 34-55816
File No. SR-DTC-2006-16

Dear Ms. Morris:

Thank you for the opportunity to provide comments regarding the DTC proposed rules for participation in the Fast and DRS programs.

Standard Registrar is a very small transfer agent providing transfer services for small pink sheet companies numbering less than 25. Several of the companies we transfer for are DTC eligible. The requirements in the proposal to participate in the FAST and DRS processing program are stringent and difficult to achieve—therefore prohibiting us to participate in the programs.

The cost of insurance is prohibitive. The number of transactions we process are few and the market value is low. It is our feeling that by allowing DTC to set limits for insurance is against the Unfair Practices Act and would be putting the small transfer agent OUT OF BUSINESS!

As for Audit Requirements DTC is trying to implement—we feel that we have a good relationship with DTC and every item received is returned within the timeframe requirements—therefore, an unnecessary requirement on their part. This would incur additional expense.

The requirement to maintain Fast Balance Certificates unreasonable. If DTC feels this need, then they should be charged reasonable fees for the process of safekeeping of securities.

With regard to DTC Reserving the Complete Discretion to Include or Exclude Particular Issues in the FAST Program—this is against the Unfair Practices Act.

As a small transfer agent, our revenues are generated by the items received for transfer. These fees are reasonable. DTC charges additionally when items are sent to the transfer agent—they do not lose revenues. It is my sincere feeling that DTC is “BIG BUSINESS” and their intent is to put the “little guy” out of business!

Thank your for allowing me to express my concerns.

Sincerely,

Mary C. Fernandez