

Mail Stop 4561

June 11, 2008

Stephen S. Romaine  
President and Chief Executive Officer  
Tompkins Financial Corporation  
The Commons  
P.O. Box 460  
Ithaca, NY 14851

**Re: Tompkins Financial Corporation  
Form 10-K  
Filed March 17, 2008  
File No. 1-12709**

Dear Mr. Romaine:

We have reviewed your June 4, 2008 response to our comment letter dated May 5, 2008. We are unable to agree with your analysis that the company's net income target qualifies for exclusion under Instruction 4 to Item 402(b) of Regulation S-K. In addition, we remind you that if you believe disclosure of targets in the future is not required because disclosure would result in competitive harm such that the information could be excluded under Instruction 4 to Item 402(b) of Regulation S-K, you must discuss how difficult it will be for the registrant to achieve the undisclosed target levels. As in all cases, we remind you that you are responsible for the adequacy and accuracy of the disclosure in your filings. We do not have any further comments on your filing.

Please contact Matt McNair, Staff Attorney, at (202) 551-3583 or me at (202) 551-3421 with any questions.

Sincerely,

David S. Lyon  
Financial Analyst

cc: By fax (585) 419-8818  
Alyssa Fontaine  
Harris Beach PLLC