



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

January 14, 2011

David K. Kershaw
Vice President and Controller
Tompkins Financial Corporation
The Commons
P.O. Box 460
Ithaca, NY 14851

Re: Tompkins Financial Corporation
Form 10-K for the Fiscal Year Ended December 31, 2009
Filed March 15, 2010
Form 10-Q for the Quarterly Period Ended September 30, 2010
Filed November 9, 2010
File No. 001-12709

Dear Mr. Kershaw:

We have completed our review of your filings and do not have any further comments at this time.

Sincerely,

Mark Webb
Legal Branch Chief