



DIVISION OF
CORPORATION FINANCE

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

January 11, 2017

Mr. James Dowd
Chief Financial Officer
Pathfinder Bancorp, Inc.
214 West First Street
Oswego, NY 13126

Re: Pathfinder Bancorp, Inc.
Form 10-K for the Fiscal Year Ended December 31, 2015
Filed March 29, 2016
File No. 001-36695

Dear Mr. Dowd:

We have completed our review of your filings. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

/s/ Stephanie L. Sullivan

Stephanie L. Sullivan
Senior Assistant Chief Accountant
Office of Financial Services