

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

DIVISION OF CORPORATION FINANCE

November 6, 2020

Thomas Schneider President and Chief Executive Officer Pathfinder Bancorp, Inc. 214 West First Street Oswego, NY 13126

> Re: Pathfinder Bancorp, Inc. Registration Statement on Form S-4 Filed October 30, 2020 File No. 333-249749

Dear Mr. Schneider:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact David Lin, Staff Attorney, at (202) 551-3552 with any questions.

Sincerely,

Division of Corporation Finance Office of Finance