

**Mail Stop 4561**  
**via fax (706) 644-1723**

July 27, 2009

Mr. Phillip W. Tomlinson  
Chairman of the Board & Chief Executive Officer  
Total System Services, Inc.  
One TSYS Way  
Columbus, GA 31901

**Re: Total System Services, Inc.**  
**Form 10-K and 10-K/A for the Fiscal Year Ended December 31, 2008**  
**Filed February 27, 2009 and April 17, 2009, respectively**  
**File no. 1-10254**

Dear Mr. Tomlinson:

We have completed our review of your Form 10-K and Form 10-K/A for the Fiscal Year Ended December 31, 2008 and related filings and have no further comments at this time on the specific issues raised.

Sincerely,

Kathleen Collins  
Accounting Branch Chief