

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