



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4561

June 22, 2017

Paul M. Todd  
Senior Executive Vice President  
and Chief Financial Officer  
Total System Services, Inc.  
One TSYS Way  
Columbus, GA 31901

**Re: Total System Services, Inc.  
Form 10-K for the Fiscal Year Ended December 31, 2016  
Filed February 24, 2017  
File No. 001-10254**

Dear Mr. Todd:

We have completed our review of your filing. 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/ Kathleen Collins

Kathleen Collins  
Accounting Branch Chief  
Office of Information Technologies  
and Services