



Securities Transfer Association of Canada

Lara Donaldson
President

October 19, 2026

Vanessa A. Countryman
Secretary
Securities and Exchange Commission
via [online portal](#)

**Re: Request for Extension of Comment Period on Transfer Agent Rules
(Release No. 34-106246, File No. S7-2026-30)**

Dear Ms. Countryman:

I am writing on behalf of The Securities Transfer Association of Canada (“STAC”) to express support for the request submitted by the Securities Transfer Association, Inc. (“STA”) for an extension of the comment period on the Commission’s proposed amendments to the transfer agent rules (the “Proposal”).

STAC supports the Commission’s effort to modernize the transfer agent rules. Many of these rules were adopted when nearly all securities were certificated and transfers were processed manually. The Proposal would update nearly every aspect of transfer agent operations, amend existing rules and forms, adopt two new rules, and rescind an existing rule. It also contains 175 numbered requests for comment, many of which seek detailed operational and cost data.

As an STA member, we have been participating in STA’s review and analysis of the Proposal and consultation with members. The breadth of the Proposal and the detailed operational and cost information the Commission seeks require careful consideration. Additional time would allow STA and its members to complete surveys, gather relevant data, and develop informed, data-driven, and constructive consensus comments.

STAC is working with the STA, as well as our member Canadian transfer agents currently registered with the SEC, to compile detailed and comprehensive comments for the various questions that have been set out in the Proposal. Due to the effort required to coordinate feedback from various operations, compliance and legal teams to ensure our commentary is detailed and useful, STAC respectfully supports STA’s request that the Commission extend the comment period on the Proposal by 45 days, to December 18, 2026. A modest extension would strengthen the record and

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support the Commission's objective of advancing its modernization agenda efficiently by producing final rules that transfer agents of all sizes can implement effectively.

We appreciate the Commission's and the staff's work on the Proposal and look forward to continuing to engage as the rulemaking advances.



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