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July 2, 2018

Mr. Brent J. Fields
U.S. Securities and Exchange Commission
100 F Street NE
Washington, D.C. 20549

Re: Transaction Fee Pilot for NMS Stocks, Securities Exchange Act Release No. 34-82873 (March 14, 2018), 83 FR 13008 (March 26, 2018) (File No. S7-05-18)

Dear Mr. Fields,

Standard Motor Products, Inc. (“SMP”) respectfully submits these written comments in response to the U.S. Securities and Exchange Commission’s (the “*Commission*”) proposal to conduct a Transaction Fee Pilot under proposed Rule 610T of Regulation NMS (the “*Transaction Fee Pilot*”). We are writing to express our concerns with the proposed structure of the Transaction Fee Pilot and to request that SMP be excluded from all pilot test groups in the event that the Commission proceeds with the proposal.

We have reviewed the comment letter that was submitted by Elizabeth K. King, General Counsel and Corporate Secretary, NYSE Group, Inc., dated May 31, 2018, and we encourage the Commission to thoughtfully consider the NYSE’s concerns. Specifically, the potential for the Transaction Fee Pilot to result in wider bid-ask spreads between issuers whose securities are subject to the proposal’s price restrictions and those issuers whose securities are not. We understand that wider bid-ask spreads could result in higher transaction costs for issuers like us who conduct share repurchase programs, and could disadvantage investment in these securities versus those securities that are not subject to the proposal’s price restrictions due to differing transaction costs for investors.

For these reasons and the others detailed by the NYSE, SMP urges the Commission not to adopt the Transaction Fee Pilot as proposed. In the event that the Transaction Fee Pilot is implemented, SMP respectfully requests that it be excluded from all pilot test groups, effectively placing it in the control group.

Sincerely,

A handwritten signature in dark ink, appearing to read "Eric Sills", written in a cursive style.

Eric P. Sills
CEO and President
Standard Motor Products, Inc.

cc: Honorable Jay Clayton, Chairman
Honorable Michael S. Piwowar, Commissioner
Honorable Kara M. Stein, Commissioner
Honorable Robert J. Jackson, Jr., Commissioner
Honorable Hester M Peirce, Commissioner
Mr. Brett Redfearn, Director, Division of Trading and Markets