

May 9, 2011

Elizabeth M. Murphy, Secretary  
U.S. Securities and Exchange Commission  
100 F Street, N.E.  
Washington, DC  
20549-1090

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**Re: Release No. 34-64099: File No. S7-11-11  
Proposed amendments to Rule 17Ad-17; Transfer agents', brokers', and dealers'  
obligation to search for lost securityholders; paying agents' obligation to search for  
missing securityholders**

Dear Ms. Murphy:

Thank you for the opportunity to provide feedback on the above referenced proposed rule amendment. Computershare Trust Company of Canada and Computershare Investor Services Inc. (collectively, "Computershare Canada") are SEC registered transfer agents and subject to Rule 17Ad-17 in its current form.

Computershare Canada shares the concern put forward in the comments made by Mr. Charles Rossi of the Securities Transfer Association ("STA") on May 5, 2011 as it relates to the proposed use of the term "missing securityholder". The term "unresponsive payee" is a more intuitive description of the intended holder records that will be reviewed and actioned by paying agents as described under the proposed amendment.

Currently, the proposed amendments require that a notice be sent to a "missing securityholder" if at the time of the next regularly scheduled check, the previously issued payment has not yet been negotiated. Given that in some cases, monthly distributions may be the regularly scheduled payment cycle, Computershare Canada is of the view that payments of this frequency would meet the paying agent notice requirement within a span of time that could frequently overlap with the payee negotiating their checks. We recommend that the timing criteria be not less than 60 days from the payable date of the outstanding check to allow sufficient time for previously issued checks to be negotiated before prompting a notice from the paying agent. Outside of this one timing issue, we do not believe the proposed amendments will be disruptive to any significant extent but will, as pointed out in the STA comments, be a source of costs related to both system programming and administration.

Should this proposed rule amendment be adopted, clarification on the effective date for the purpose of establishing the earlier of the next regularly scheduled check or the passing of 6 months from the payable date is requested as part of the Final Rule. Computershare Canada shares the STA view that the "checks issued on or after the effective date" be established as the commencement of the notice requirement.

Sincerely,

Laura Stevenson  
Compliance Officer  
Computershare Trust Company of Canada  
Computershare Investor Services Inc.

Copy to: Lindsay Horwood, Chief Compliance Officer