

January 15, 2016

Brent J. Fields, Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: Request for Extension of Comment Period on Securities and Exchange
Commission Release No. 34-76743, File No. S7-27-15 ("Concept Release")

Dear Mr. Fields:

Computershare Inc. and Computershare Trust Company, N.A. ("Computershare") thank the Commission and its staff for their tremendous effort in issuing the comprehensive Concept Release relating to updating and modernizing transfer agency rules, and appreciates the opportunity to comment on the Concept Release.

Computershare is one of the largest transfer agents in the United States, servicing more than 60% of the S&P 500 Companies, as well as many small issuers, and nineteen million registered shareholder accounts.

Computershare respectfully requests additional time, preferably up to 60 days, to provide its response to the Concept Release. As you are already aware, there are over 170 areas of interest where the SEC is requesting comment, and hundreds of questions presented. We believe this additional time will allow Computershare to provide a more thorough and thoughtful response, given the many years since transfer agency rules have been reviewed. In addition, Computershare is part of the working group supporting the Securities Transfer Association ("STA") in its efforts to respond to these questions as well. While the STA will respond on behalf of the industry as a whole, given our size and unique products and services offered to our 6,000 clients, Computershare likely has a unique perspective and experience to share on a number of the areas presented and will need to respond under separate cover. We hope that, by providing additional time, we will be able to provide a greater level of detail and analysis to our response that we believe will benefit the Commission in its proposed rulemaking.

For the reasons set forth above, we respectfully request an extension of the comment period for up to an additional 60 days.

Sincerely,



Martin J. McHale, Jr.
President, U.S. Equity Services

cc: Moshe Rothman, Branch Chief
Thomas Etter, Special Counsel
Catherine Whiting, Special Counsel
Mark Saltzburg, Special Counsel
Lauren Sprague, Special Counsel
Elizabeth de Boyrie, Counsel