

January 22, 2015

Brian J. Fields, Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 220549-1090

**Re: Request for Extension of Comment Period on Release Nos. 34-76743, File No. S7-27-15,  
Transfer Agent Regulations Concept Release**

Dear Mr. Fields:

The American Bankers Association (ABA),<sup>1</sup> on behalf of the ABA Corporate Trust Committee, appreciates the time and effort taken to produce the comprehensive Concept Release seeking to modernize the Transfer Agent regulations to reflect the enormous changes in the industry that have taken place since the regulations were first adopted in 1975. The release incorporates both an Advance Notice of Proposed Rulemaking addressing specific areas, such as transfer agent registration and reporting requirements, and safeguarding of customer funds and securities, as well as a Concept Release seeking input on issues of concern to the Commission, including bank and broker-dealer recordkeeping for beneficial owners.

The ABA Corporate Trust Committee is comprised of bank indenture trustees providing more than 90 percent of the corporate trust services in the U.S. They routinely provide transfer agent and paying agent services for issuers of corporate and municipal debt, and look forward to providing comments on many of the issues raised in the Concept Release.

The Commission's effort to modernize the Transfer Agent regulations is laudable and deserving of careful consideration by industry participants. However, because of the comprehensive nature of the Release, which includes 170 separate areas of inquiry and over 600 individual questions, we believe that the comment period provided is insufficient for our members to provide thoughtful, constructive responses to the Commission. We further note that given the December 22 Release date, the holiday break has effectively shortened the comment period provided by the Commission.

For these reasons, we respectfully request that the comment period be extended for an additional 60 days.

Sincerely,



Cristeena G. Naser  
Vice President and Senior Counsel  
Center for Securities, Trust & Investment

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<sup>1</sup>The American Bankers Association is the voice of the nation's \$16 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$12 trillion in deposits and extend more than \$8 trillion in loans.