



Filed Electronically

August 17, 2017

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

RE: Proposed Rule Change – File No. SR-BatsBZX-2017-34

Dear Mr. Fields:

Global Payments Inc. would like to take the opportunity to comment on the proposal to introduce the “Bats Market Close” (SR-BatsBZX-2017-34).

We are proponents of a market structure that supports pooling liquidity and promotes price discovery. Thus, any change that would threaten that market structure concerns us. We believe the “Bats Market Close” would introduce unnecessary complexity into the system, fragment liquidity and create more price volatility for us and for other corporate issuers.

In addition, we specifically choose to list on the NYSE partly due to the benefits afforded us by oversight of a Designated Market Maker (DMM). We think their role is important throughout the trading day but especially during the opening and closing auctions. If liquidity is fragmented, we believe our DMM’s role in facilitating a fair market in our stock would be negatively impacted which would be a disservice to us as well as our investors.

We respectfully request the Commission carefully consider the negative implications of approving the proposed “Bats Market Close”.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cameron Bready', is written over a white background.

Cameron Bready
SENIOR EXECUTIVE VICE PRESIDENT & CHIEF FINANCIAL OFFICER
GLOBAL PAYMENTS INC.

T: [REDACTED]
[REDACTED]