

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

DIVISION OF CORPORATION FINANCE

October 5, 2010

Philip W. Tomlinson Chairman and Chief Executive Officer Total System Services, Inc. One TSYS Way Columbus, Georgia 301901

> Re: Total System Services, Inc. Definitive Proxy Statement on Schedule 14A Filed March 18, 2010 File No. 001-10254

Dear Mr. Tomlinson:

We have completed our review of your filing and have no further comments at this time on the specific issues raised.

Sincerely,

Maryse Mills-Apenteng Special Counsel