

May 10, 2023

Vanessa Countryman
Secretary, Securities and Exchange Commission
By email: rule-comments@sec.gov

Re: Request for Extension of Comment Period on Securities and Exchange Commission Releases No. 34-97143, File No. S7-07-23 ("Regulation Systems Compliance and Integrity"), No. 34-971432 File No. S7-06-23 ("Cybersecurity Risk Management Rule for Broker-Dealers, Clearing Agencies, Major Security-Based Swap Participants, the Municipal Securities Rulemaking Board, National Securities Associations, National Securities Exchanges, Security-Based Swap Data Repositories, Security-Based Swap Dealers, and Transfer Agents"), and No. 34-97141, File No. S7-05-23 ("Regulation S-P: Privacy of Consumer Financial Information and Safeguarding Customer Information")

Dear Secretary Countryman:

The Securities Transfer Association, Inc. ("STA") thanks the Commission and its staff for their effort in issuing the three Rule Proposals regarding aspects of cybersecurity and consumer and customer protected information and appreciates the opportunity to comment on these Releases.

STA is the professional trade association of transfer agents, official record-keepers interacting daily with issuers, their investors, and broker-dealers regarding securities offerings, issuances, transfers, dividends, corporate actions, and a myriad of other functions. STA's membership is comprised of over 130 commercial stock transfer agents, bond agents, mutual fund agents, and related service providers within the United States and Canada. Collectively, STA members service more than 100 million registered shareholders on behalf of more than 15,000 publicly traded and private companies.

STA supports the position of the Securities Industry and Financial Markets Association ("SIFMA") which respectfully requests that the Commission extend the public comment period to at least 120 days after publication in the Federal Register. As you are already aware, there are nearly 1,200 pages in a broad sweep of three proposals. All of these proposals, and additional proposals issued by the Commission, must be reviewed by, and responded to, by the same people at interested and impacted entities. We believe this additional time will allow STA to

provide a more thorough and thoughtful response, given the volume of the proposals. 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.

Additionally, the proposals must be reviewed in the context of other laws, rules, and regulations which govern the areas addressed by these proposals. For example, various state laws require notification to the states, and other, within specific time periods. Further, Congress has provided extensive opportunities for public comment, in the form of a 60-day response period for the Request for Information issued in September 2022 pursuant to the Cyber Incident Reporting for Critical Infrastructure Act of 2022, to be followed by another comment period after publication of the Notice of Proposed Rulemaking. This dual-phased approach is much more likely to yield useful comments than the short timeline the Commission has imposed for the Proposals here.

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

Sincerely,



Peter Duggan
President

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