

November 22, 2021

Vanessa A. Countryman, Secretary  
Securities and Exchange Commission  
100 F Street NE Washington, DC 20549

**RE: Potential Technical Changes to EDGAR Filer Access and Filer Account Management Processes,  
File Number S7-12-21**

Dear Ms. Countryman:

Thank you for the opportunity to comment on the potential technical and administrative changes to the EDGAR System through EDGAR Next.

With over 50 years of market leadership, Toppan Merrill provides our clients from across the globe with technology solutions and superior service. We support an array of registrants in meeting their ongoing SEC regulatory and compliance requirements with our deep subject matter expertise. The EDGAR Next initiative represents a significant change to the current filing process and would introduce a new framework of EDGAR access and administration. Any change this significant requires robust testing and consideration. In order to provide registrants and the filings agents who support them with adequate time to evaluate and respond to the SEC's request for comment, we ask that the SEC extend the comment period deadline.

We commend and support the SEC's focus on security and modernizing the EDGAR system which is presented in the request for proposal. We appreciate that the SEC released a Beta testing environment. However, the current EDGAR Beta Next environment does not provide a complete testing environment which represents the full scope of proposed technical changes. For example, the current EDGAR filing website is accessed using a CIK and EDGAR password while the EDGAR password would be eliminated in the planned changes. It is not possible to provide thorough and focused comments to the SEC with these restrictions in the limited timeframe provided. For the following reasons we respectfully request that the SEC extend the proposal comment time period:

- The proposed changes would deeply impact the full range of SEC registrants from individuals who report Section 16 forms to Mutual Funds and corporate issuers. For a change of this magnitude, it is vital that all market participants are engaged and able to provide meaningful assessment and comments.
- If changes are implemented without proper evaluation, it could impede capital formation and delay compliant filings.
- Many registrants were unaware of the proposed changes, particularly given the tight comment period deadline.

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- SEC compliance filing deadlines in November do not allow filers adequate time to access and evaluate the EDGAR Next changes.

We believe that the SEC can balance EDGAR security modernization with fully engaged input from the filing community.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "JoAnn P. Kern", is written over a light gray rectangular background.

JoAnn Kern  
President