THOMSON REUTERS

Via Electronic Delivery

December 5, 2016

Brent J. Fields
Secretary
Securities and Exchange Commission
100 F Street NE.
Washington, DC 20549–1090

Re: File Number S7-22-16 - Amendment to Securities Transaction Settlement Cycle

Dear Mr. Fields

Thomson Reuters appreciates the opportunity to comment on the proposed amendment to the securities transaction settlement cycle (the "T+2 proposal"). Thomson Reuters[1] through our Financial & Risk business unit provides buy-side, sell-side and corporate customers with information, analytics, workflow, transaction and technology solutions/services that enable effective price discovery and support efficiency, liquidity and compliance. In particular, our wealth management offerings[2] include a complete suite of products that enable retail and institutional brokers to manage the daily tasks of their front, middle and back office operations. We provide back office processing services to our clients in support of timely settlement. As such, we are directly impacted by the T+2 proposal.

We support the move to T+2 and have been actively working on implementing changes in support of a T+2 settlement cycle for over two years. The industry mandate to move to T+2 including our role on the Industry Working Group and our clients' participation in the Industry Steering Committee has driven our development efforts and implementation schedule. It is important to recognize that our development efforts associated with this initiative are complete and we are now actively involved in internal testing efforts and preparedness for industry testing.

We believe the SEC's approval of the T+2 proposal is a necessary step towards achieving regulatory certainty and that the proposal should be approved in its current

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[1]Thomson Reuters is the world's leading source of intelligent information for businesses and professionals. Combining industry expertise with innovative technology, it delivers critical information to leading decision makers in the financial and risk, legal, tax and accounting, intellectual property and science and media markets powered by the world's most trusted news organization. For more information about Thomson Reuters, please go to www.thomsonreuters.com.
[2]For more information on Thomson Reuters Wealth Management offerings, see here.

form. The following sections of this comment letter detail our reasons for moving forward with approval of the T+2 proposal.

Industry Focus Should Remain on T+2 Settlement Cycle

As acknowledged in the T+2 proposal, the move to T+2 will bring U.S. settlement cycles in line with many European and Asian markets. Additionally, there would be consistency with the FX markets. Not only is cross-market consistency desirable, it should also be recognized that the implementation effort in terms of system and process changes is considerably more to move to T+1. Given the industry focus over the past several years on moving to T+2, we believe the U.S. markets are in a position to incrementally reduce systemic risk in September 2017. Shifting implementation efforts to achieve T+1 settlement at this time would only delay our ability to achieve this risk reduction.

Impact of T+2 on Other Commission Rules/Interpretations As Expected

We appreciate the Commission's acknowledgement that the T+2 proposal may impact other Commission rules including Reg SHO interpretations. We believe that modifying the Reg SHO interpretation as suggested in the T+2 proposal is appropriate. There is likely to be an operational impact to stock loan departments in terms of policies and procedures including the need to train staff to adjust to a shortened recall cycle. However, these changes were anticipated as part of the move to T+2 and our clients have been preparing accordingly.

September 5, 2017 Should Be the Compliance Date for the Move to T+2

The analysis that went into recommending September 5, 2017 as the effective date for moving to T+2 was extensive and included broad industry participation taking into account issues related to readiness, industry testing and the benefits of implementing after a holiday weekend. We urge the Commission to set September 5, 2017 as the compliance date for the T+2 proposal. We and our clients are prepared to make this date and believe adherence with the Industry Steering Committees recommendation will reduce systemic risk and minimize disruption.

Conclusion

Thomson Reuters appreciates the opportunity to comment on the T+2 proposal and supports its adoption. We ask that the Commission act swiftly to provide regulatory certainty for this industry initiative that is aimed at reducing systemic risk and achieving harmonization with international markets.

Regards,

Manisha Kimmel

Manisha Kimmel

Chief Regulatory Officer, Wealth Management
Thomson Reuters