

SECURITIES

TRANSFER
CORPORATION

February 26, 2016

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

Re: Request for Extension of Comment Period on Securities and Exchange Commission
Release No. 34-76743, File No. S7-27-15 ("Concept Release")

Dear Mr. Fields:

Securities Transfer Corporation ("STC") is appreciative of the Commission and its staff for their tremendous effort in issuing the comprehensive Concept Release relating to updating and modernizing transfer agency rules, and appreciates the opportunity to comment on the Concept Release.

STC is a mid-sized transfer agents located in the United States, that for almost 30 years has been providing our services to mostly small and mid-sized issuer. We believe that our position within the industry provides us with a perspective when commenting on the proposed new rules that would be beneficial to the Commission.

STC respectfully requests additional time, preferably up to 90 days, to provide its response to the Concept Release. As you are already aware, there are over 170 areas of interest where the SEC is requesting comment, and hundreds of questions were presented. We believe this additional time will allow STC to provide a more thorough and thoughtful response, given the many years that have elapsed since transfer agency rules have been reviewed.

For the reasons set forth above, we respectfully request an extension of the comment period for up to an additional 90 days.

Sincerely,



Kevin B. Halter, Jr.
President

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