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Secretary of the Commission  
Securities and Exchange Commission  
100 F Street NE  
Washington DC 20549-1090

Re: Proposed Rule Change to Add a Fee to Be Charged to Transfer Agents of DTC-eligible Issues Subject to a Corporate Action (Release #SR-DTC-2015-012)

Colonial Stock Transfer Company, Inc. located in Salt Lake City, Utah would like to take this opportunity to thank the Securities and Exchange Commission for the opportunity to comment on the Depository Trust Company ("DTC") proposed Corporate Actions Eligibility Fee ruling. Colonial Stock Transfer has been a transfer agent providing professional transfer agent services to public and private companies for nearly 30 years.

While we support DTC receiving reasonable compensation for services provided, we feel that the proposed DTC Corporate Actions Eligibility Fee may be excessive and burdensome for small issuers. Fee increases are felt more by small companies and the proposed \$1,000 fee for making a new CUSIP eligible would certainly have a larger impact on small issuers. We propose that this rule be changed to consider the interests and effects this would have on small companies.

The proposed \$1,000 fee for a corporate action such as a name change seems disproportionate with the amount of time and effort it might take to process this type of corporate action and assign a new CUSIP number for a security that was already DTC eligible prior to the corporate action. The impact of this fee puts small issuers at a disadvantage and we suggest that DTC implement an alternative solution, such as offering the fee on a tiered basis according to the size of the company, to help alleviate the burden of these unwarranted fees.

DTC claims that this fee will not be burdensome to companies and is designed to help counter the costs that DTC accumulates when attempting to make securities eligible for their services. However, we feel that this fee will be burdensome and may not accurately reflect the actual costs of DTC's work on every corporate action type for smaller issuers. For example, the review and processing time for corporate actions with name changes may require significantly less review than other corporate actions such as spin-offs or stock dividends, as no change to the share structure is occurring. Similarly, stock splits may require less review and processing than stock dividends and spin-offs.

In conclusion, if DTC continues to implement the proposed fee increase, we recommend that a tier-based fee schedule be presented based on the issuer size and corporate action type. We also recommend that DTC reduces its fees for small issuers and corporate action types such as name changes and stock splits.

If you have any questions or would like to discuss this matter further please contact me at 801-355-5740.

Sincerely,

Daniel Carter  
Vice President of Client Services