

DIVISION OF CORPORATION FINANCE

## UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

November 3, 2014

<u>Via E-mail</u> Michael J. Chewens Senior Executive Vice President and Chief Financial Officer NBT Bancorp, Inc. 52 South Broad Street Norwich, NY 13815

> Re: NBT Bancorp, Inc. Form 10-K for the Fiscal Year Ended December 31, 2013 Filed March 3, 2014 Form 10-Q for the Fiscal Quarter Ended June 30, 2014 Filed August 11, 2014 File No. 000-14703

Dear Mr. Chewens:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Michael Volley

Michael Volley Staff Accountant