



RECEIVED
C.F.T.C.

00 FEB 28 AM 11 00

OFFICE OF THE SECRETARIAT

February 24, 2000

COMMENT

Secretary of the Commission Jean Webb
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street NW
Washington, DC 20581

Received CFTC
Records Section

Dear Ms. Webb:

The North Dakota Wheat Commission, representing 80 percent of the durum produced in the United States, is concerned with the proposed changes to the durum futures contract at the Minneapolis Grain Exchange. The Commission's primary function is to develop international and domestic markets for North Dakota wheat. In this role we continually promote high quality standards for both producers and customers.

North Dakota has developed a strong reputation for being a source of premium quality durum. N.D. durum is sought for its high protein content, excellent color and strong mixing properties. Certainly, environment can have an impact on specific quality parameters from year-to-year, but historically, N.D. varieties, environment and producers have combined to produce durum that meets or exceeds industry needs.

The proposed contract specification changes, although well intended to bring a greater degree of liquidity to the market, could serve to diminish the quality perception of U.S. durum at a time when domestic and international quality demands continue to increase. Specifically, the proposal to lower minimum protein requirements to 12.5 percent from 13 percent would not be representative of durum produced in our state and seems to be a needless change. Over the past ten years the average protein of the N.D. durum crop has been 13.7 percent, more than sufficient to meet current contract specifications.

The North Dakota Wheat Commission urges you to carefully review the merit of the proposed changes to the durum futures contract. It is imperative that the long-term quality reputation for U.S. durum not be unduly diminished in the process.

Thank you for your time and consideration.

Sincerely,

Alan Lee
Chairman

CC: US Durum Growers
ND Grain Growers
US Wheat Associates
Minneapolis Grain Exchange

RECEIVED
C.F.T.C.
00 FEB 28 PM 2 26

4023 State Street
Bismarck, ND 58501-0690

Tel: 701/328-5111

Fax: 701/328-5115
e mail: ndwheat@ndwheat.com
web site: http://www.ndwheat.com