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secretary

From: Frederick White [fwhite@gcd.com]
Sent: Friday, September 01, 2000 10:47 AM
To: 'CFTC--Secretariat Office (Comments)'
Subject: Regulatory Reinvention

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I am submitting this comment in response to the proposed rulemaking on A New Regulatory Framework. The Commission should find a much less burdensome way to regulate swap transactions that comply with all of the requirements of Part 35 except for the prohibition on the use of multilateral transaction execution facilities. Under the proposal, a swap transaction platform available solely to commercials, and that meets the other non-MTEF requirements of Part 35, would have to be recognized as a DTF if the platform is an MTEF. The DTF requirements appear to be very onerous. A swap platform, particularly one that deals only in commodities that are not the subject of futures trading, should not have to meet those requirements merely because it can't meet the MTEF requirement of Part 35.

COMMENT

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