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April 28, 2003

COMMENT

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Ms. Jean A. Webb
Secretary to the Commission
Commodity Futures Trading Commission
1155 21st Street NW
Washington DC 20581

Re: Proposed Amendments to Rule 1.35(a-1)(5) – Post Execution Allocation
of Bunched Orders, 68 *Fed. Reg.* 12319 (March 14, 2003)

Dear Ms. Webb:

Credit Suisse First Boston LLC ("CSFB") is pleased to submit this comment letter in response to the above-referenced rule amendment to the Commodity Futures Trading Commission's ("Commissions") rule 1.35(a-1)(5). CSFB would like to take this opportunity to commend the Commission for their efforts in amending the terms and conditions of an existing rule by eliminating certain unnecessarily burdensome requirements while simultaneously retaining certain aspects of the rule that will enable futures commission merchants ("FCM's") and account managers to meet their respective responsibilities to the futures markets and to their customers.

As a member of the Futures Industry Association ("FIA"), CSFB has read the FIA comment letter dated April 18, 2003 filed with the Commission regarding the above-referenced rule amendment and CSFB agrees with the content and spirit of the letter.

In particular, we would also like to highlight certain areas of the rule amendment. First, we believe that the proposed expansion of the class of eligible customers is appropriate and we believe that the proposed rule contains proper protections. The expansion to all customers who provide written investment discretion to account managers captures a smaller class of customers that would not have otherwise benefited from the execution advantages currently available to eligible customers.

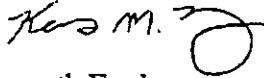
CSFB also believes that the proposed expanded class of account managers fosters a better environment in which to engage in trading in U.S. markets and gives the U.S. markets a better competitive advantage in the global trading arena.

We applaud the proposed deletion of the requirement for FCM's to obtain a certification from account managers and do not believe that the deletion of the requirement compromises regulatory goals or violates core principles of the Commission.

CSFB especially welcomes the concept in the amendment where the Commission requires account managers to provide allocation information in a time sufficiently before the end of trading session so as to avoid end of day congestion.

We thank you for the opportunity to comment on the proposed rule amendment. We support the rule amendment and believe that it retains the essential requirements to allow fair and equitable end of day allocation for bunched orders. The rule amendment meets all of the required regulatory objectives and allows FCM's and account managers to have more flexibility in which to comply with the rule. Customers also benefit from the rule amendment since it expands the class of customers and still provides that customer accounts or groups of accounts are treated equitably.

Sincerely,



Kenneth Ford
Managing Director