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**Received CFTC
Records Section**

7/10/06

secretary

From: Alex Roslin [roslin@videotron.ca]
Sent: Saturday, July 08, 2006 10:09 AM
To: secretary
Subject: COT reports

COMMENT

Dear Ms. Donovan,

Thank you for the opportunity to present my comments on the COT reports. I believe they are an excellent tool for traders, researchers and journalists. My comments are below:

1 (a) The commercial trader often seem to be positioned correctly in the markets when they are at extreme net short or long positions (i.e., >2 standard deviations from their six-month moving average net long or short position). It can also be useful to plot the net positions on a chart and look for trendline violations. The information can be useful information for trading, but trades shouldn't be undertaken without technical confirmation in the underlying cash markets.

(b) Opposite of above.

(c) I haven't tried to analyze futures trading.

2. I sometimes use the reports for journalistic writing, and some of the market analysts I read write about them.

3. Don't know.

4. YES!

5. Not sure, but if you do please do NOT change the existing reporting columns and data compilation. That would make any comparison and analysis between the existing system and any new system very difficult. In other words, if you break out any data from the commercial positions, please continue to report the commercial holdings as you currently calculate them, and then include another column with, for example, non-traditional commercial positions broken out.

6. Don't know.

7. Don't know, but see 5 above. Same comment applies regarding reporting thresholds. Please do not make any changes that make it difficult or impossible to do comparisons of the existing data set with any new data set.

8. See 5 and 7 above.

9. No opinion.

10. No opinion.

11. No opinion.

Additional comments:

- The COT reports would be even more useful if released without the existing time lag of several days. I realize this is an improvement over the past, but any reduction in the time lag would be very helpful.

- It would be very helpful for the CFTC to release twice-weekly or even daily data. Perhaps a long-term objective for the CFTC?

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- It would be very helpful to have a data set available from the CFTC about the cash market prices, in order to facilitate analysis of correlations and other research about the relationship between the COT data and the cash market.

- It would be very helpful to have access to analyses of the COT data done by the CRTC or on its behalf.

Thank you for your attention.

Best regards,
Alex Roslin

5677 St-Urbain
Montreal, Quebec
H2T 2X2
Canada

tel.: 514-948-0091
email: roslin@videotron.ca