



**Securities Industry Association**

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COMMODITY FUTURES  
TRADING COMMISSION  
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March 19, 1998

**COMMENT**

Jean A. Webb  
Secretary  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street, N.W.  
Washington, DC 20581

*Via E-Mail*

Re: Rule Proposal on Requests for Exemptive, No-Action, and Interpretative Letters

Dear Ms. Webb:

The OTC Derivatives Products Committee of the Securities Industry Association (SIA)<sup>1</sup> expects to comment on the proposed rule regarding "Requests for Exemptive, No-Action, and Interpretative Letters."<sup>2</sup> However, given the many issues the Committee is currently working on and the fact that the FIA annual conference has attracted a number of Committee members, I fear it will be impossible for us to meet the comment deadline of March 23<sup>rd</sup>. Therefore, I respectfully request a two week extension of the deadline.

If you have any questions about our request, please feel free to call me at (212) 618-0507 or to contact me by e-mail at [jquinn@sia.com](mailto:jquinn@sia.com). Thank you.

Sincerely,

Gerard J. Quinn  
Vice President and  
Associate General Counsel

<sup>1</sup> The Securities Industry Association is the trade association representing more than 750 securities firms headquartered throughout North America. Its members include securities organizations of all types--investment banks, brokers, dealers, specialists, and mutual fund companies. SIA members are active in all markets, and in all phases of corporate and public finance. Collectively, they provide investors with a full spectrum of investment services and account for approximately 90% of the securities industry's revenue in the United States.

<sup>2</sup> 63 Fed. Register 3285 (Jan. 22, 1998).