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National Grain and Feed Association

March 23, 1998

Ms. Jean A. Webb
Secretary to the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N. W.
Washington, D. C. 20581

COMMENT

Dear Ms. Webb:

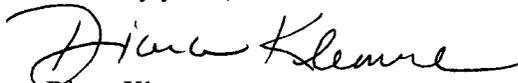
This letter responds to the proposed rule on: Requests for Exemptive, No-Action and Interpretative Letters (E, NA and I Letters).

The National Grain and Feed Association (NGFA) is comprised of 1,000 member companies involved in the cash grain handling, marketing, processing and futures industry. Our company members include country elevators, feeding operations, processors, exporters and related businesses that are the primary users of grain and oilseed futures and options markets for commodity pricing and hedging.

The NGFA is supportive of a more formal set of guidelines governing the CFTC's handling of public requests for Exemptive, No-Action and Interpretative (E, NA and I) Letters. We believe one goal of such guidelines should be to make the consideration and approval of such letters more transparent to the public. Provided that rules give requesters the option of protecting confidential information, we think the market would benefit by having information that could aid in understanding CFTC and staff interpretations of applications of laws under various circumstances. This "tool" could become more important with the implementation of an agricultural trade options pilot program.

Part (b) 1 of the rule states in part "... staff may refuse to consider or respond to a request without explanation" (our emphasis). We would urge the CFTC to reconsider this portion of the rule. If a requester of an E, NA or I Letter goes to the trouble and expense of following the guidelines as stipulated in this rule, we believe the CFTC staff should be bound to offer some reasonable response and explanation. Refusal to respond without explanation would not appear to serve the needs of the marketplace or the CFTC.

Sincerely yours,


Diana Klemme
Chair