

April 6, 1998

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COMMENT

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Brooksley Born, Chairperson
Commodity Futures Trading Commission
1155-21st Street, N.W.
Washington, DC 20581

Dear Chairperson Born:

I was recently made aware of the Commission's January 26, 1998 "concept release" regarding non-competitive trading techniques. I am writing to express my concern over this new proposal.

I believe that should the CFTC allow off floor negotiation and execution of futures trades, the consequences would have a dire impact on price discovery and market liquidity. The customer will be harmed by the lack of transparency in the market. If price discovery is not taking place in the open market, it will severely inhibit a trader's ability to compete on a level playing field with the off floor participants.

Permitting off-floor negotiation and execution of futures trading would fragment and ultimately destroy the greatest futures market in the world. I urge you not to adopt these rules.

Sincerely,



Dewitt Gross
455 W. Front St. #506
Wheaton, IL 60187

DG/vg