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COMMENT

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April 6, 1998

Ms. Jean Webb
Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street N.W.
Washington, DC 20581

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Re: CFFE Contract Market Application

Dear Ms. Webb:

As a board member of the New York Cotton Exchange and long time participant in the futures industry and global futures markets, I am writing this letter to support the Cantor Financial Futures Exchange's (CFFE) application to become a contract market.

It is my belief that the CFFE, which intends to operate entirely electronically, enhances the regulatory environment, improves the financial integrity of the clearing process and most importantly, allows the trading of futures products to become more competitive and economically efficient.

The CFFE's electronic trading system provides an accurate and verifiable audit trail throughout every trading session, mitigating concerns over front running or improper order allocations. Time and sales information becomes more reliable.

The New York Cotton Exchange and Commodity Clearing Corporation are better able to identify and isolate net market exposure on a timely basis, improving the risk management process. Trade differences can be quickly resolved, limiting out trade differences.

Customers clearly benefit from better yet less intrusive regulation and from the heightened degree of financial integrity in the clearing system. In addition, market users are afforded more anonymity, a large number of trades can clear the market at one price at any given time, price information becomes instantaneous, and transaction costs are dramatically reduced through competitive pricing and more efficient order execution.

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Finally, combining the regulatory and clearing expertise of the New York Cotton Exchange and Commodity Clearing Corporation with Cantor Fitzgerald's trading technology represents a creative and competitive industry response to today's exchange environment.

Thank you for this opportunity to comment briefly on the CFFE's application.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Peter F. Karpen".

Peter F. Karpen