

19980312  
#2  
98-15  
NC ①

# New York State Bar Association

One Elk Street, Albany, New York 12207 • 518/463-3200

COMMODITY FUTURES  
RECEIVED  
OFFICE OF THE  
SECRETARIAT



MAY 28 3 05 PM '98

CFTC

COMMENT

## BUSINESS LAW SECTION

1987-1998 Executive Committee

RONALD F. DAITZ

Chair  
Wall Gotshal & Manges  
787 Fifth Avenue  
New York, NY 10153  
212/310-8337  
FAX 212/735-4880

BANDRA STERN

First Vice-Chair  
Nordquist & Glem  
508 Madison Ave., Suite 2004  
New York, NY 10022  
212/207-8150  
FAX 212/317-1030

RAYMOND H. BEITZ

Second Vice-Chair  
and Fiscal Officer  
Phillips Lytle et al  
3400 Marine Midland Cr.  
Buffalo, NY 14203  
716/647-7085  
FAX 716/862-6100

EMMEON GOLD

Secretary  
Wall Gotshal & Manges  
787 Fifth Avenue  
New York, NY 10153  
212/310-8225  
FAX 212/735-4835

Delegates to the House of Delegates:

Joseph D. Hansen  
John R. Taylor, Jr.

MEMBERS:

SAMUEL F. ABERNETHY

New York

FREDERICK G. ATTEA

Buffalo

GREGORY J. BLASI

New York

ROBERT S. CALHAN

Rochester

HARVEY J. CAVAYERO

Carle Place

PETER N. CUBITA

New York

ELEANOR JANOSEK DOYLE

New York City

ANNE EVANKO

Buffalo

ROBERT P. FINE

Buffalo

LAWRENCE D. FRUCHTMAN

New Rochelle

JANET THIELE GELDZAHLER

Washington, D.C.

DAVID L. GLASS

New York City

PATRICIA N. GRACE

Buffalo

RICHARD E. GUTMAN

Iring, TX

MICALYN S. HARRIS

Ridgewood, NJ

IRA L. HERMAN

New York

RICHARD R. HOWE

New York City

MICHAEL IOVENKO

New York City

BARBARA KENT

New York City

JOHN B. KINUM

Albany

GUY P. LANDER

New York

ANTHONY J. LEITNER

New York City

JOHN H. MANCUSO

Cleveland, OH

JULIAN S. MILLSTEIN

New York

STUART B. NEWMAN

New York City

JAMES W. ORBAND

Binghamton

JOHN M. QUITMEYER

New York City

ALAN D. RETZFELD

New York City

GEOFFREY C. ROGERS

Albany

PAUL H. SILVERMAN

New York City

M. HOLLAND WEST

New York City

### BY TELEFAX

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

Re: Rules of Practice, Proposed Amend-  
ments Fed Reg., Vol. 63, No. 64/  
April 3, 1998

Dear Ms. Webb:

On behalf of the New York State Bar Association's Committee on Commodities and Futures Law I request an extension of thirty days of the comment deadline on the referenced notice of proposed rule making.

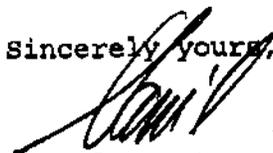
The State Bar Association is comprised of approximately 60,000 attorneys licensed to practice in New York, and the Committee is comprised of 50 attorneys in private practice, government, corporations, and academia. They represent or have an interest in commodity and derivatives industry institutions and individuals, including futures commission merchants, floor brokers, floor traders, customers, commodity pool operators, commodity trading advisors, banks, investment banks, and commercial operators in the cash and futures business. Our committee has submitted comments on a variety of proposed rules in the past.

Ms. Jean A. Webb  
May 28, 1998  
Page 2

Although I had anticipated filing a letter by the June 2nd deadline, our May meeting had to be cancelled at the last minute due to professional conflicts and we are not scheduled to meet again until June 25th. A thirty day extension would give our committee an opportunity to discuss fully our draft comment letter and make changes if necessary.

Obviously, a prompt reply to this request would be much appreciated.

Sincerely yours,



Samuel F. Abernethy  
Chairman

SFA/ed

cc: Geoffrey Aronow, Esq.