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February 14, 2000 RECEIVED
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OFFICE OF THE SECRETARIAT

Jean A. Webb, Secretary
Commodity Futures Trading Commission
Three Lafayette Center
21st Street, NW
Washington, DC 20581

COMMENT

Dear Ms. Webb:

The Texas Cattle Feeders Association (TCFA) is opposed to the Commodity Futures Trading Commission's proposal that would permit futures markets for agricultural commodities to place new rules and rule amendments into effect on the business day following their submission to and receipt by the CFTC.

TCFA is opposed to any regulations that would not allow reasonable opportunity for input from the cattle industry on futures contract changes. A recent case in point would be the request by the CME to expand the contract limits in the live cattle contract. If this streamline procedure had been in place when the CME submitted the expansion request, it would have been possible for the change to be in place the following day without any chance for comments from the industry.

Although any submission is suppose to include a "description on any substantive opposing views expressed by members of the contract market or others with respect to the rule" TCFA feels that the description could be well short of input the Commission would receive directly from those affected by any proposal.

TCFA is concerned that this rule would create a system where one party (exchange) is able to exercise leverage over producers, without the opportunity for input from the cattle industry on contract changes.

TCFA definitely feels that no rule change should be allowed for contracts with open interest and are already trading. Not only would such a rule have the potential do damage basis trading strategies, TCFA feels that such a situation could create an environment for possible law suits as producers might try to correct problems caused by such a rule.

In conclusion, TCFA is opposed to CFTC's "Proposed Revision of the Commission's Procedure for the review of Contract Market Rules" for agricultural contracts.

Sincerely,

Jim Gill
Market Director

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