INTERACTIVE BROKERS GROUP LLC
ONE PICKWICK PLAZA
GREENWICH, CONNECTICUT 06830
TEL (203) 618-5800 • FAX (203) 618-5934

Thomas Peterffy
Chairman

David M. Battan
Vice President & General Counsel

INTERACTIVE BROKERS LLC
TWO PICKWICK PLAZA
GREENWICH, CONNECTICUT 06830
TEL (203) 618-5800
FAX (203) 618-5770

440 SOUTH LASALLE STREET
CHICAGO, IL 60605
TEL (312) 542-6900
FAX (312) 542-3990

INTERACTIVE BROKERS
(U.K.) LTD.
10 AND 10A ARTHUR STREET
LONDON EC4R 1AY
ENGLAND
TEL (44) 207 283 9270
FAX (44) 207 283 9386

INTERACTIVE BROKERS
CANADA INC.
360 ST. JACQUES #2004B
MONTREAL, QUEBEC H2Y 1P5
TEL (514) 547-1017
FAX (514) 876-7854

TIMBER HILL LLC
TWO PICKWICK PLAZA
GREENWICH, CONNECTICUT 06830
TEL (203) 618-5800
FAX (203) 618-5835

440 SOUTH LASALLE STREET
CHICAGO, IL 60605
TEL (312) 542-6900
FAX (312) 542-3990

TIMBER HILL
EUROPE AG
GOTTHARDSTRASSE 4 OST
CH-6300 ZUG
SWITZERLAND
TEL (41) 41 726 5000
FAX (41) 41 726 5005

TIMBER HILL
(U.K.) LTD.
10 AND 10A ARTHUR STREET
LONDON EC4R 1AY
ENGLAND
TEL (44) 207 283 9270
FAX (44) 207 283 9386

TIMBER HILL
HONG KONG LTD.
SUITE 1512, 3 PACIFIC PLACE
44 QUEENSWAY
ADMIRALTY, HONG KONG
TEL (852) 2921 2906
FAX (852) 2309 4102

TIMBER HILL SECURITIES
HONG KONG
SUITE 1512, 3 PACIFIC PLACE
44 QUEENSWAY
ADMIRALTY, HONG KONG
TEL (852) 2921 2906
FAX (852) 2309 4102

TIMBER HILL
AUSTRALIA PTY LTD.
LEVEL 15
36 PITT STREET
SYDNEY, NSW 2000
AUSTRALIA
TEL (61) 2 9240 2145
FAX (61) 2 9240 2144

TIMBER HILL
CANADA CO.
360 ST. JACQUES #2004B
MONTREAL, QUEBEC H2Y 1P5
TEL (514) 547-9035
FAX (514) 547-0132

October 21, 2003

Via Electronic Mail and Federal Express

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

Re: Application of U.S. Futures Exchange, LLC for Contract Market Designation

Dear Ms. Webb:

The Interactive Brokers Group LLC submits this comment letter in support of the application of U.S. Futures Exchange, LLC ("USFE") for contract market designation. The USFE will be a competitive new electronic market based on proven technology and with experienced management, and it will be subject to full Commission oversight. We respectfully request that the Commission approve the USFE application as soon as practicable.

IB Group affiliates including Timber Hill LLC and Interactive Brokers LLC are registered futures commission merchants that are active in proprietary and agency trading on all major U.S. and non-U.S. derivatives exchanges. Up to ten percent of the global exchange-listed equity derivatives volume each day is traded by IB Group companies, and our order routing network connects customers in virtually every country in the world with the major liquidity centers. IB Group companies own 2 full CBOT seats and lease 14 more, and we own 1 full CME seat and have an outside assignment for another. We also own and lease various partial/limited trading seats on both exchanges.

Relatively free and open cross-border competition has helped the futures market to thrive and has served the public interest. The Commission has been a leader in working to ensure open access to and from U.S and foreign markets, and it should not now turn its back on these principles by delaying or denying the application of the USFE simply

PDF created with pdfFactory trial version www.pdffactory.com

because it is a venture of the German-based Eurex Frankfurt, A.G.

In the global economy of the future, there should be no artificial barriers to entry and there should be free and unfettered competition on price, technology and market structures. Open and free competition and choice will benefit U.S. and non-U.S. users of the global futures markets and will facilitate the formation of capital and liquidity and its efficient allocation across the globe.

Although the Commission has been importuned by USFE's competitors to deny the exchange's application for designation as a contract market, the Commission's role is not artificially to protect or shelter domestic exchanges from their global competitors. Indeed, the policy issue at stake here is broader than simply the futures markets. The longer that governmentally protected monopolies or franchises are allowed to prevail at the expense of free competition, the slower a unified global economy will evolve and the longer international, racial and religious tensions will persist.

Thank you for your consideration and feel free to contact us if we can provide any further information to the Commission.

Respectfully submitted,

Thomas Peterffy

David M. Battan

cc: Hon. William H. Newsome, Chairman
Hon. Barbara Pedersen Holum, Commissioner
Hon Walter Lukken, Commissioner
Hon. Sharon Brown-Hruska, Commissioner

PDF created with pdfFactory trial version www.pdffactory.com