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secretary

**From:** Bradt, Zachary K. [zac.bradt@ou.edu]  
**Sent:** Monday, February 18, 2008 12:30 PM  
**To:** secretary  
**Subject:** Exemption from Registration for Certain Firms with Regulation 30.10 Relief

Comments on RIN 3038-AC26

**COMMENT**

To whom it may concern:

I am writing to comment on the proposed rule to exempt from registration certain firms with Regulation 30.10 relief. I believe this exemption would be beneficial to both US customers and firms outside the US.

Although the non-US firms do not have to register, the requirement that these firms meet Regulation 30.10 relief is a good safeguard to ensure US customers receive protection and can expect certain standards to be maintained. Another safeguard to be implemented that I believe would be effective is the requirement that the foreign firms be affiliated with and FCM and the acknowledgement by the FCM.

The consumer can be further protected by not permitting the solicitation of new US customers. The commission seeks comments on whether the proposed limited purpose registration exemption should be extended to otherwise qualified foreign persons. I do not believe the exemption should be extended at this time. The Commission has provided a means of US customers to eliminate the transaction costs associated with the use of multiple order entry processes. To extend the exemption at this to other foreign persons could potentially decrease the safeguards in place. Permitting foreign persons to advise US customers on foreign and US markets at this time is not advantageous at this time.

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