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**From:** Karen Reddy [57mreddy@comcast.net]  
**Sent:** Thursday, November 06, 2008 5:37 PM  
**To:** secretary  
**Cc:** Karen Reddy  
**Subject:** "Proposed Rules for Trading Off the Centralized Market"

2008 NOV -7 AM 8:55

O.P.C. THE SECRETARIAT

To whom it may concern:

I have been involved in futures and options trading since 1979, first as a floor broker and more recently a screen trader as that seems to be way the industry has evolved (for better or Worse). Many of the tried and true rules and industry standards of open outcry trading such as showing only the best bid and offer and not market depth {which was a fineable offence for 135 years} and trading against customer's orders {also fineable} are now acceptable and promoted. If that's progress so be it, it's the same for all traders large institutions, funds, banks, and Uncle Joe trading his one and two contract pieces from his home. My problem is when two parties can block trades with one another without all parties having access. On the former NYBOT this was considered prearranged trading and penalized severely. AS I understood the block rule the size of these trades were to be unusually large blocks for that given market. If a given market trades 250 lot pieces 2500 lot or more blocks would be acceptable. As it stands now the size of these block trades are to small.

In the past 16 months with the onset of electronic trading on the ICE products {former NYBOT} the volatility has increased and in some of the smaller markets volume decreased do to loss of experienced traders losing confidence in market trading conditions. Not having the ability to participate under these foolish block volumes will knock more traders out of these smaller markets such as OJ and COCOA and COFFEE causing permanent damage to the market place. Don't get me wrong I am an ICE share holder and hope they do well, but not at the cost of destroying 135 years of exchange due dilligence. Please give careful consideration to these block rules because sometimes the decisions by the new slash and burn show profit at all cost exchanges is not for the good of the whole.

Respectfully,

Michael W.Reddy

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