



ILLINOIS
**CORN
 GROWERS**
 ASSOCIATION

COMMENT

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June 21, 2000

Jean Webb, Secretary
 Commodity Futures Trading Commission
 Three Lafayette Centre
 21st N.W.
 Washington, D.C. 20581

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Dear Secretary,

Viable commodity price risk transfer opportunities are critical to a corn producer's enterprise. The Chicago Board of Trade's (CBOT) proposal to raise or eliminate trading limits threatens farmers' participation with this commodity exchange and could leave them without viable alternatives.

Corn producers and their cooperative grain elevators are at a disproportionate financial disadvantage relative to multinational grain and food companies in a volatile market. Unlimited margin requirements could mean that smaller capitalized groups will not be able to stay with the trading. This ultimately could lead to further grain industry concentration and diminished farmer-marketing power as grain companies attempt to achieve trading scale.

We understand and empathize with the CBOT's competitive realities, but we believe that the proposal to raise trading limits further excludes corn producers. We would appreciate that you take these issues into consideration as you develop your commodity trading policy.

Thank you,

Leon Corzine, President
 Illinois Corn Growers Association

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