

MIKE FARM ENTERPRISES, INC.

2274 E. Lytle Five Points Rd.

Dayton, OH 45458



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COMMENT

June 18, 2000

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O.F.T.O.

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

Dear Ms. Webb:

I am an Ohio corn and soybean producer and I currently use the Chicago Board of Trade to help me manage my marketing risks. I understand the CBOT is proposing amendments to increase the daily price fluctuation limits.

As I understand the proposal, the CBOT/Eurex exchange will be put in place in lieu of Project A on July 10, 2000. This new combined exchange would increase price limits by 50% and delete the variable/expanded limits, due to the fact that a price limit function cannot be programmed into the Eurex. If and when price limits are subsequently reached, ETS market supervision personnel will manually halt trading in all contract months and options strikes for the remainder of the session.

I am opposed to increasing the price limits by 50% and deleting variables/expanded limits as they now exist. Substantial price swings can result in significant margin calls for me as I hedge my products. This potential volatility raises my cost to utilize futures and options in my risk management plan. Limitation in the daily price movement is imperative. I believe the current limits are quite acceptable.

I encourage the Chicago Board of Trade to delay consolidation with the Eurex until the daily price limits can be incorporated into the trading program. Changing the computer system Eurex uses to make sure the markets continue to function properly would make more sense than making the markets more difficult and less useful to producers in their hedging strategies.

Thank you for your consideration in this matter. Please advise if you need further clarification of my position on these issues.

Sincerely,

Michael Clark

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