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COMPREHENSIVE REVIEW OF THE COMMITMENTS OF TRADERS REPORTING PROGRAM

71 FR 35627 (June 21, 2006)

THE ATTACHED PDF FILE IS WORD-SEARCHABLE

NUMBER OF COMMENTS RECEIVED ON THIS DATE: 11

Eileen Donovan, Acting Secretary
Commodity Futures Trading Commission
#3 Lafayette Center
1155 21st Street, NW
Washington, DC 20581
August 15, 2006

Subject: Commitments of Traders (COT) – Request for Comments from the Commodity Futures Trading Commission; deadline: 08/21/06

Dear Madam Secretary/CFTC,

In response to your CFTC-Release #5190-06 of June 21 & 23, 2006, and in reply to your Federal Register Notice, FR Doc. E6-9722, updated 06/21/06 requesting public comment concerning the COT Reports, I wish to ask that the CFTC carefully consider the merits and importance of continuing the publication and public distribution of the COT Reports (Commitments of Traders).

In my 35 years of investment research and experience, I have become convinced that the COT Reports are among the most valuable of all government periodic publications concerning economic and investment-market facts and figures. The publication and public distribution of the weekly COT Reports make a vital contribution to the transparency, the integrity, and the soundness of U.S. investment-markets, including our nation's vital capital-formation-markets.

Furthermore, the weekly COT Reports provide invaluable market data and information to the investing public, as well as to professional investment advisors and to fund- and money-managers; market information that contributes strategically to the development and implementation of successful investment strategies. The COT Reports are a vitally important market research “tool” uniquely useful in the designing of investment strategies that help to more effectively diversify and distribute risk, and that more accurately help to develop investment portfolio goals and objectives, such as successful investment strategies for retirement planning.

In an age and era too often scarred by a “Culture of Corruption” that roils U.S. investment markets and threatens to undermine them --- corruption such as in the Enron case and the WorldCom case, and such as in the fraudulent back-dating of option values for hidden corporate executive pay-out schemes, and such as in the pervasive epidemic of special-interest influence and manipulation of many government institutions (such as in the Jack Abramov case with Congress) --- in such an age and era as this – it is of paramount importance that the COT’s vital factual data about U.S. commodity and financial futures markets, including indexes, bonds, world currencies, etc. --- it is of paramount importance that this market information continues to be published and made available to the public.

The publication and distribution of the COT Reports contributes to better informing and educating the American investment community; thus helping to restore and renew the public's trust in our nation's important financial, business, government, and market institutions. In an increasingly competitive global economy, the COT Reports assist in meeting the vital need of the American people to more soundly and independently provide for their own retirement planning and security. In conclusion, I again request and re-emphasize the critical need for the CFTC to weigh carefully the merits and importance of continuing the public publication and distribution of the weekly COT Reports, the Commitments of Traders.

Respectfully yours,

David B. Macrory

David B. Macrory

2207 Madison Ave.

San Diego, CA 92116

619-688-9579

secretary

From: DEnterpriz@aol.com
Sent: Monday, August 21, 2006 11:42 PM
To: secretary
Subject: COT REPORTS

Review of the COT Reporting Program

August 21, 2006

In response to the questions and the request for comments, please review the following:

I did not deem it necessary to include the questions, as they are numbered accordingly.

1. (a) Commercial information is used by me to understand how the major users of each individual commodities are being used by the people who are not just hedging , but buying the product for use.
 - (b) Non commercial information I use to judge the speculation of other investors.
 - (c) Understanding the speculators (non commercial) positions, appear to leverage the cash market only as the short term usage is concerned.
2. I am sure they are but I am unable to comment on their uses.
3. Not to my knowledge
4. Yes...definitely as they are a useful tool in evaluating the markets
5. I think that it would be a help to broaden the use.
6. No!...I do not believe so. Most of us can see the swing of the change in their positions already and understand what is happening.
7. If there is a chance of this happening...placing this information in a quarterly report would be a better choice.
8. Only those impacted by the changes.
9. No!...note above.
10. Yes...note #7
11. I would not think it would but some allowances could be made to take or set aside that burden if necessary.

Thank you for allowing me to comment on these purposed changes as a tool in trading the commodities market. The COT is important

to me and I would sorely miss the benefits and insights which they offer.

Thank you
Dale Prodoehl

secretary

From: Richard P. Vogt [rpvogt@cox.net]
Sent: Tuesday, August 22, 2006 3:17 PM
To: secretary
Subject: COT Reports

Please continue these reports. The information should be made available. Thank you.

Richard P. Vogt
San Diego

secretary

From: warren jacobs [waj12634@bellsouth.net]
Sent: Tuesday, August 22, 2006 3:18 PM
To: secretary
Subject: COT reports

July 24, 2006

Sirs:

Please continue weekly COT reports

warren jacobs

Huntersville NC 28078

secretary

From: Heitman, Donald H.
Sent: Tuesday, August 22, 2006 3:30 PM
To: secretary
Subject: FW: COT Reports

From: Richard P. Vogt [mailto:rpvogt@cox.net]
Sent: Tuesday, August 22, 2006 3:17 PM
To: Heitman, Donald H.
Subject: COT Reports

Please continue to make these reports available. The information should be disseminated to the public.

Richard P. Vogt
San Diego

secretary

From: Jackie Elfatouri [jelfatouri@midsouth.rr.com]
Sent: Tuesday, August 22, 2006 11:04 AM
To: secretary
Subject: COT Report

As an individual trader, I rely heavily on the COT report to assist me in making market decisions.

I am therefore deeply concerned that the CFTC would even consider discontinuing such a popular and insightful service. Your own site shows close to 500,000 users last year. The report has been the subject of over 40 University studies and two best selling books.

While the report may need modification, the number and size of exemptions granted by the Commission would seem to demand more transparency, not less. In general, any changes should not result in discontinuing, suspending or delaying, the Commitments' report, and the Commission should take precautions to implement report changes in such a way as to maintain continuity with historical data. Absent historical reference, the report becomes nearly unintelligible.

PLEASE ALSO CORRECT THE HEDGER DATA

Under the Commission's rules a hedge fund buying futures contracts is listed as a speculator and is subject to position limits. However, if the same hedge fund acts through an intermediary swap dealer, it can operate without position limits, and the position is categorized as a Commercial under the guise that the swap dealer is now a "bona fide hedger." If the Commission cannot see that this is the same speculative money, then I would prefer to see it listed under a separate category and reserve the hedger category for traditional hedgers.

I urge you to continue publishing the reports. They are a valuable tool for investors throughout the world.

Thank you for keeping our markets transparent with full disclosure to the public.

secretary

From: Jason Taucher [jtaucher@swbell.net]
Sent: Tuesday, August 22, 2006 12:59 PM
To: secretary
Subject: COT Report

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secretary

From: Larry Williams [larrywms@worldnet.att.net]
Sent: Monday, August 21, 2006 7:06 PM
To: secretary
Subject: cot report

I have been a follower of the COT reports since 1969 and was the first person to write a book (Trading with the Insiders) on this subject matter. Along with my several thousand readers we have found the reports to be invaluable.

Accordingly there are two points I would like to make for your consideration;

- 1) Where the report is of greatest value is in breaking down the participants of the market into public, large traders and those who use the markets on a commercial basis for their business via hedging. This has been the strength of the reports and I hope will be maintained.
- 2) It may well be that it is time for a new category of reporting of participants that have effectively hedged via arbitrage and exchange rate risks as opposed to those who are hedging against actual inventories or for production purposes.

It is my hope the Commission will delve into this area and I know it will be greatly appreciated by my readers. If I can be of any assistance in these matter please advise. Along with Steve Briese, I was responsible for the "letter writing" campaign , and can bring a select group of industry traders together to assist on these critical issues.

With respect,

Larry Williams
Publisher
Commodity Timing

secretary

From: brian robinson [brianr55@comcast.net]
Sent: Monday, August 21, 2006 7:08 PM
To: secretary
Subject: COT Report

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secretary

From: mitch [mitchmad@microsoft.com]
Sent: Monday, August 21, 2006 4:58 PM
To: secretary
Subject: COT Report

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Thank you for keeping our markets transparent with full disclosure to the public.
Mitch
Madenfort

8/22/2006

secretary

From: Daryl [dtrain89@hotmail.com]
Sent: Monday, August 21, 2006 5:32 PM
To: secretary
Subject: COT Report

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8/22/2006