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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: 3

secretary

From: Bob [bobz@csidata.com]
Sent: Wednesday, August 23, 2006 4:06 PM
To: secretary; Sabrina Carle; Insider Capital Group; Steven Davis
Subject: CFTC reports

The Commodity Futures Trading Commission
Washington, DC 20581

Dear Secretary:

As a provider of Commodity Trading Information to several thousands of U.S. customers, I can't believe that you would consider dropping or even compromising the services of the CFTC to the trading public. Our customers depend upon your reports to identify types of trader interests. It is very important for my customers who represent thousands of parties who are classified as commercial hedgers, large traders and small traders who desperately need to know the identity of the various parties who hold positions in all regulated futures market elements.

My customers need to know hedgers from simple traders, speculators from commercial interests, and those who are hedging from those who are simply speculating for profit.

It would be contrary to my companies business if the CFTC were to abandon the thousands of customers who depend upon the services that the CFTC provides to my company. I hope you will reconsider any plans to abandon my company and my customers by terminating services at the CFTC. My customers are depending on me to persuade you to resume services as usual. I hope that I won't be compelled to tell them that you turned down my plea on their behalf to keep the CFTC moving forward as before.

Thankyou for considering this urgent request.

Sincerely,

Robert C. Pelletier, President of Commodity Systems, Inc.

In response to your request for comments, I am deeply concerned that the CFTC would consider discontinuing such a popular and insightful report. While the report may need modification, the number and size of exemptions granted by the Commission would seem to demand more transparency, not less. Certainly true hedgers should have their own category. In general, any modification must avoid

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discontinuing, suspending, or delaying the Commitments reporting. And the Commission should take precautions to implement report changes in such a way as to maintain continuity with historical data. Finally, I would request that if the Commission should decide to make changes that could negatively affect the continuation, continuity, or promptness of the COT report, that it submit such proposed changes for further specific public comment.

secretary

From: ROBT E COOPER [cooper7804@sbcglobal.net]
Sent: Wednesday, August 23, 2006 2:13 PM
To: secretary
Subject: COT reports

Please, please, please, don't discontinue the COT reports. All that will happen is the industry insiders will use this information to take more money from the smaller traders. Dissemination of information is quietly, one of the critical responsibilities of a responsive government that represents... all of the people.

Thank you so much for letting me write,

Robert Cooper
Oklahoma City, Oklahoma

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secretary

From: Stuart Murray [srmurray@erols.com]
Sent: Tuesday, August 22, 2006 11:29 PM
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.

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