

COMMENT

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secretary

From: GREGORY SHOOP [grgshoop@sbcglobal.net]
Sent: Friday, July 14, 2006 2:06 PM
To: secretary
Subject: COT Report: Comment

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To: Eileen Donovan, Acting Secretary, Commodity Trading Futures Commission
From: Gregory Shoop
Re: COT Report

This is in response to your request for comments on the 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. I am not the only person who finds the report to be valuable. 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 Absent historical reference, the report becomes nearly unintelligible.

Additionally, I think you need to 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 COT reports. They are an invaluable tool for investors throughout the world.

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

Best regards,
Gregory Shoop

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