



New York
Mercantile Exchange

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August 18, 2006
OFFICE OF THE SECRETARIAT

Ms. Eileen Donovan
Acting Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st St. NW
Washington, DC 20581

Re: Comprehensive Review of the Commitments of Traders Reporting Program

Dear Ms. Donovan:

The New York Mercantile Exchange Inc. ("NYMEX" or "Exchange")¹ appreciates the opportunity to comment on the Commodity Futures Trading Commission's ("Commission") *Federal Register* Release dated June 21, 2006, requesting comment on potential modifications to the Commitments of Traders ("COT") Reporting Program.

NYMEX favors the Commission's continued publication of the COT Report and also generally supports its current initiative to review and to request public input on the way in which it presents COT data. The Exchange urges, however, that the Commission staff carefully consider whether any future proposed change in the type, quantity or categorization of data could potentially lead to the disclosure of specific traders' activities in a way that unduly disadvantages them. If any change is proposed in the future that carries the potential for giving undue advantage to one or more market participants over others, the Exchange respectfully suggests that such proposals be closely scrutinized prior to any final action and, if implemented, that such implementation be done initially on a pilot program basis, such that any actual effects of the new COT Report could be assessed and corrected if necessary.

¹ NYMEX is a for-profit corporation organized under the laws of the State of Delaware. It is the chief operating subsidiary of NYMEX Holdings, Inc. As a Designated Contract Market and a registered Derivatives Clearing Organization, NYMEX is the largest exchange in the world for the trading and clearing of futures and options contracts on energy and metals commodities. Shares of NYMEX Holdings, Inc. are not listed on a national market or exchange but are registered with the Securities and Exchange Commission ("SEC") and, as such, are subject to the rules and regulations of the SEC.

New York Mercantile Exchange, Inc.

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The New York Mercantile Exchange, Inc., is composed of two divisions.

The NYMEX Division offers trading in crude oil, heating oil, unleaded gasoline, natural gas, electricity, coal, propane, platinum, and palladium. The COMEX Division offers trading in gold, silver, copper, and aluminum.

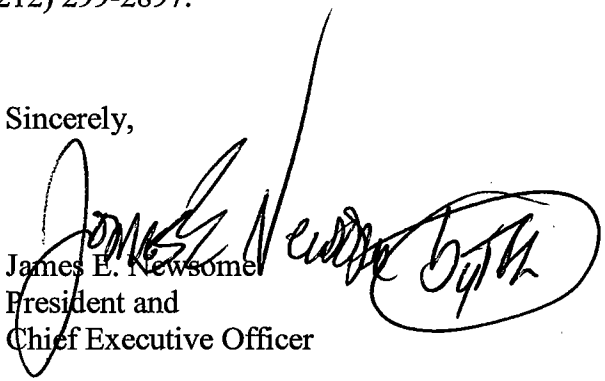
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The Exchange thanks the Commission for this opportunity to comment on this important proposal. If the Commission or its Staff have any questions regarding these comments, please feel free to contact Thomas F. LaSala, NYMEX's Senior Vice President of Compliance and Risk Management at (212) 299-2897.

Sincerely,


James E. Newsome
President and
Chief Executive Officer

CC: Reuben Jeffery III, Chairman
Walt Lukken, Commissioner
Michael Dunn, Commissioner
Fred Hatfield, Commissioner