

CFTC Letter No. 98-02**December 24, 1997****Division of Trading & Markets**Re: Request for Relief from Commodity Pool Operator Registration

Dear :

This is in response to your April 17, 1997 letter to Susan Ervin regarding relief on behalf of "X" from the commodity pool operator registration requirement of Section 4m(1) of the Commodity Exchange Act. After careful consideration by Commission staff, the Division has decided to deny your request for relief.

As you know, pursuant to Rule 4.12(b), qualifying commodity pool operators already are relieved from certain of Part 4's disclosure, reporting and recordkeeping requirements. Commission staff believe that further registration relief on an ad hoc basis is not warranted at this time, although if you wish to pursue this matter further we are certainly willing to entertain any petition for rulemaking regarding the issues presented in your letter.

Please feel free to contact me at (202) 418-5430 if you want to discuss this further.

Sincerely,

I. Michael Greenberger

Director