

TO: Comment File – RIN 3038-AD15 AND AD16
76 FR 4752 (Jan. 26, 2011)

FROM: Bruce Fekrat, Division of Market Oversight

RE: Comments on Proposed Position Limits for Derivatives Rulemaking

On April 26, 2011, at 10:00 a.m. EDT, Chairman Gensler and Commission staff participated in a meeting with representatives of the Alternative Investment Management Association (AIMA) and Crossroads Strategies. Topics discussed included a request by AIMA to consider alternative approaches to account aggregation as proposed in the position limits rulemaking. AIMA also requested that cleared and uncleared derivatives not be treated as separate classes for the purpose of applying position limits.

Present at the meeting:

Todd Groomer, AIMA
Stewart Hall, Crossroads Strategies
Hunter Moorhead, Crossroads Strategies

CFTC

Chairman Gary Gensler
Phyllis Dietz
Eileen Donovan
Jackie Mesa
Bruce Fekrat
Amanda Olear
Kevin Walek
Steve Sherrod