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PARENTER PROBLEM TO SECURIOR ON BLANCS ON

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COMMENT

April 3, 1998

Brooksley Born, Chairperson Commodity Futures Trading Commission 1155 - 21st Street, N.W. Washington, DC 20581

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Dear Chairperson:

This letter is commenting about a proposal to permit various forms of non-competitive futures trading, including off-floor negotiation, execution, or futures trades.

I believe rules permitting off-floor negotiation and execution will jeopardize customers from receiving a fair price. I believe customers would lose the protection of centralized markets. I also believe centralized markets would lose valuable liquidity that is so important to pricing. Please consider these negative factors when reviewing this "concept release."

Sincerely,

James McMillin Associate Member

ams & MMlli

Chicago Board of Trade