

From: IBcoalition.org <info@ibcoalition.org>
Sent: Wednesday, March 10, 2010 3:49 PM
To: secretary <secretary@CFTC.gov>
Subject: Regulation of Retail Forex RIN 3038-AC61
Attach: Joint Comment Letter on CFTC 1-signed.pdf

Mr. David Stawick
Secretary
Commodity Futures Trading Commission
1155 21st Street, N.W.
Washington, DC 20581

Re: RIN 3038-AC61

Dear Mr. Stawick:

The undersigned firms appreciate the opportunity to provide our joint comments to the Commodity Futures Trading Commission (□ **CFTC** □ or □ **Commission** □) on its proposed rules for □ Regulation of Off-Exchange Retail Foreign Exchange Transactions and Intermediaries, □ 75 FR 3282 (Jan. 20, 2010). Each of the undersigned firms is in the business of providing intermediation services as introducing brokers to a growing class of active, sophisticated traders □ many of whom consider themselves professionals □ who trade foreign exchange (□ forex □) on an over-the-counter basis with forex dealers. We provide traders with valuable trading support products to assist them in developing their trading skills, enable them to analyze their trading performance on a real-time basis and promote their understanding of the off-exchange forex markets. Importantly, we assist our trader clients in deciding which dealers suit their needs, helping them evaluate a confusing array of dealer trading platforms, services and fee structures from which to choose. For that part of our businesses, we each have referral relationships with multiple forex dealers.

Please see the attached PDF for the full letter and signatures. Please confirm your receipt of this message. We will follow up with a faxed version.