

From: Carl Royer <appraiser@pnnw.net>
Sent: Sunday, April 11, 2010 4:30 PM
To: Metals Hearing <metalshearing@CFTC.gov>
Subject: comment on issue of position limits for precious metals

Dear Sir;

It has been suggested that I write to you in a form somewhat like this:

"Thank for the opportunity to comment on the issue of position limits for precious metals. Please establish a speculative position limit in COMEX silver of no more than 1500 contracts. Please restrict any hedging exemptions from those limits to legitimate hedgers. Please stop the levels of concentration in COMEX silver futures that have been experienced over the past few years on the short side of the market."

I'm not convinced that limits would be the answer. There is probably truth in the retort that the shorts would move to a different venue such as London, and we would no longer get the action due to over-regulation. Maybe that would solve the problem, maybe not. Who really knows?

What I am suggesting is transparency. I believe in open markets in all senses of the word. Tell us 'who has what position and how many and how much' on a delayed basis such as 24 or even 48 hours, so we can decide for ourselves whether markets are being manipulated and by who.

Sincerely,

Carl Royer

