

"R. H." Goodwin

16 APRIL 2010

DAVID STAWICK, SECRETARY
COMMODITY FUTURES TRADING COMM. 3 MAFAYETTE CIR.,
1155 21ST STREET, N.W.,
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DEAR SIR:

THE OPPORTUNITY/CHANCE TO PRESENT VIEWS AND COMMENT ON POTENTIAL CHANGES TO LIMITS AND AMOUNTS OF POSITION LIMITS AND SHORT SIDE TRADING OF PRECIOUS METALS.

IT WOULD SEEM WISE TO AVOID HAVING THE PARTICIPANTS HOLD MORE THAN 1500 CONTRACTS. THESE LIMITS SHOULD APPLY TO NOT ONLY TO THE COMEX, BUT TO OTHER EXCHANGES YOU MAY NOT CONTROL. CERTAINLY EXEMPTIONS FROM THESE LIMITS FOR LEGITIMATE HEDGERS WILL BE NEEDED TO EXIST, BUT CARE MUST BE TAKEN TO AVOID EXCESSIVE MISUSE OF LIMITS.

YOU HAVE THE RESPONSIBILITY TO HALT THE EXCESSIVE LEVELS OF CONCENTRATION BY VERY FEW TRADERS THAT HAVE BEEN USED TO MANIPULATE THE MARKET, ESPECIALLY WITH HUGE SHORT POSITIONS.

YOUR INTEREST AND ACTION ON THESE MATTERS IS NEEDED AND WILL BE VITAL.

THANK YOU,

R. H. Goodwin

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