C.F.T.C. OFFICE OF THE SECRETARIAT



2010 OCT 4 PM 3 36

Patrick J. Nugent Executive Director

COMMENT

September 24, 2010

Mr. David A. Stawick Secretary Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, NW Washington, DC 20581

Ms. Elizabeth M. Murphy Secretary Securities and Exchange Commission 100 F Street, NE Washington, DC 20549-1090

Re: Comments of Texas Pipeline Association Regarding Definitions Contained in Title VII of Dodd-Frank Wall Street Reform and Consumer Protection Act (RIN 3235-AK65; 3038-AD06) and Support of Coalition of Physical Energy Companies Comments

Dear Mr. Stawick and Ms. Murphy:

The Texas Pipeline Association ("TPA") is a trade organization representing 34 independent companies that gather, process, treat and transport natural gas and hazardous liquid materials throughout Texas and the United States. TPA's members play a significant role in assisting the production and distribution of domestic energy resources, and in achieving and maintaining our country's energy independence. These companies provide thousands of high paying jobs in small communities throughout the U.S. They also provide the essential link between energy producers and energy consumers providing American businesses and households with domestically produced energy.

TPA appreciates the opportunity to comment on the Advanced Notice of Proposed Rulemaking ("ANOPR") regarding the definitions of key terms outlined in the Financial Reform legislation at the referenced ANOPR. TPA and its members support the views expressed in the comments of the Coalition of Physical Energy Companies (COPE) with regard to the definition of important terms and the clearing and margin issues. We respectfully request the adoption of the proposed regulatory text included in these comments in any Notice of Proposed Rulemaking concerning the definitions of the terms "swap dealer," "swap," "major swap participant," and the related terms within those definitions."

TPA welcomes the opportunity to visit on this issue. Please contact us with any questions or if we may be of any assistance. Again, thank you for the opportunity to comment and I wish you all the best.

Sincerely,

Patrick J. Nugent

Executive Director