



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

January 12, 2011

Re: Foreign Futures and Options Contracts on a Non-Narrow-Based Security Index; Commission Certification Procedures

Dear Mr. Stawick:

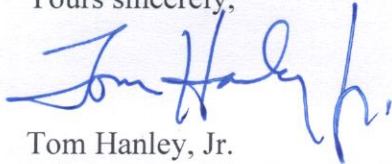
Infinium Capital Management, LLC ("Infinium"), voices its support for the proposed new Section 30.13 of the Commodity Futures Trading Commission's rules which would provide for an expeditious procedure for certification by a foreign board of trade that the index underlying a futures contract is a non-narrow-based stock index which complies with the requirements of Section 2(a)(1)(C)(iv) of the Commodity Exchange Act.

We understand that the Commission's proposal would alter the procedures whereby foreign boards of trade can provide (in the U.S.) contracts based on an index that complies with the requirements for non-narrow-based stock indexes. This change will benefit firms like Infinium by making products available for trading without undue delay. Foreign exchanges often are forced to launch their stock index products without the support of U.S. firms due to the uncertainty and potential delay that arise from the current process. This procedure often denies to new contracts their best chance for success, by preventing participation by the most sophisticated segment of the market, U.S. trading firms. Furthermore, U.S. members, like Infinium, are often sidelined from attractive market making and liquidity programs that are common around the launch of new products, because approval in the U.S. is so uncertain.

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The proposed certification procedures would also help close the gap that has developed between the speedy procedures under which a U.S. futures market may list new index contracts and the lengthy process foreign exchanges must follow. Closing this gap will help spur innovation both in the U.S. and abroad and will benefit not just trading firms but also brokers and their customers.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Tom Hanley, Jr.", with a stylized flourish at the end.

Tom Hanley, Jr.
Infinium Capital Management, LLC