

**From:** C.B. OKaan <email@okaan.com>  
**Sent:** Thursday, January 21, 2010 7:20 PM  
**To:** secretary <secretary@CFTC.gov>  
**Subject:** Regulation of Retail Forex

---

Dear Secretary,

On January 13, 2010, the CFTC announced proposed new regulations concerning retail foreign currency transactions. Many of the proposed changes would implement important consumer protection regulations, which we as small traders firmly favor. However, one of the proposed changes would radically lower Forex leverage from 100:1 to 10:1 for all NFA and CFTC regulated Forex firms.

Under the proposed rule, here are some examples based on trading 10,000 USD:

Currency Pair	Current Requirements*	Margin	Proposed Requirements	Margin
EUR/USD	\$142		\$1,420	
GBP/USD	\$163		\$1,630	
USD/JPY	\$100		\$1,000	

\*Current margin requirements based on rates as of January 19th, 2010

The impact of these new requirements for a FOREX trader could be significant. Under existing rules and based on present day exchange rates, a \$10,000 account could buy or short control just over 700,000 EURUSD. With the new proposed rule, the same account would only be able to buy or short 70,000 EURUSD, significantly affecting the results of the trade and could wipe up the small traders and only will allow the big traders and capital bank institutions to stay.

We already are trading with daily margins of hundreds just because of the 100:1. Winning or losing margin of those kinds of trades are only \$10 for 1 mini lot of trade which only controls the \$1000. If the ruling changes from 1:100 to 1:10 small daily trades will be no longer available to trade. As usual small investors will be wiped out to leave the place to only big investors. Besides, Other countries including European small daily traders will still stay in the same exchange margins. If your new regulation takes place, we, as American small traders will be no longer to compete with others any more. Instead of; as of today having only \$1000 available in our trade accounts, we will be force either close our accounts or deposit \$10000 just one mini lot to trade, which may bring only \$10 win on 10 pip change in currency pairs.

Please reconsider the regulating the Forex leverage to 100:1 for everybody as of most of the NFA and CFTC regulated

Forex firms are applying today instead of proposed 10:1.  
For more information please contact the MB Trading, or  
other well known and trusted forex trading firms.

Regards,

C.B. Okaan

Small account owner as public