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COMMENT

February 24, 2011

Mr. Gary Gensler, Chairman
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Dear Chairman Gensler:

I am writing to you as a silver investor who has carefully followed the market for many years and who has serious concerns over the impact that position limits in COMEX silver pose to investors such as myself. I urge you to approve the staff's proposal on position limits, including limiting exemptions to bona fide hedgers.

I would also ask, however, for you to readjust the proposed formula in silver. The current formula would result in a position limit of over 5,000 contracts for any single speculator, on an all-months-combined basis (5,000 contracts is the equivalent of 25 million ounces of silver). This is too high of a threshold in light of the realities of the world silver market.

There are only three mining companies in the world that produce more than 25 million ounces of silver per year and only a similar number of industrial consumers using more than that amount. Any speculator holding an amount of silver derivatives greater than what 99% of the world's silver producers and consumers make or use in a year would have inordinate pricing power. The purpose of speculative position limits is to prevent such a circumstance.

Please institute a 1,500 contract (7.5 million ounce) position limit for silver.

Respectfully submitted,



Nick J. Zieser