

Comment on Position Limits for  
Derivatives 17 CFR Parts I 150 & 151 ?  
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CFTC

COMMENT

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OFFICE OF THE  
SECRETARIAT

March 25 2011

Dear Commissioners,

I have tried a couple of times to register my views by computer but to no avail! At the end of my computer submission it asked for a "code" but nothing in your instructions, that I could find, provided that information. Others may have had this problem like me. Therefore I am having to write you.

It is time for you as a Commissioner to put into effect what Congress has required you to do, namely specify the size of, and enforce position limits on all finite commodities.

I want to speak to precious metals as this is the market I trade in occasionally. It has been obvious to me for many years, that the gold and silver markets have been manipulated by the big banks. Therefore, in order to limit their concentration in the markets a 1500 contract limit for SILVER and a 500 contract limit for GOLD would be appropriate, with nophony exemptions for the large banks. Exemptions to these position limits should only be given to PROVEN producers, who wish to hedge real production. It makes no sense to allow a large

bank to "Ledge" its exposure on say the London Bullion market when that market is basically a paper market & the COMEX is supposed to be a physical market.

You have delayed this implementation of what Congress asked you to do for long enough. Now is the time to take a leaf out of the Nike playbook & "Just Do It."

Concentration of thousands & thousands of contracts in the hands of a few banks leads to manipulation. The way to deal with this concentration is to limit the number of contracts they can hold. You enforce it, the CFTC. Don't leave it to the exchanges like the COMEX (the CME Group). The exchanges only care about volume & profits for their members. They don't care about us, the public. You & Congress should be representing us.

Submitted with respect,

Sincerely,

John P. Mappin.

JOHN P. MAPPIN,