



420 W. MARION

MONTICELLO, IL 61856

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TO: U.S. Commodity Futures Trading Commission

SUBJECT: CME proposed corn limit change

Topflight Grain Cooperative is a farmer owned cooperative that uses the CME to manage risk in daily operation of our business. We handle corn, beans, and wheat. We are a typical hedger that buys grain from our farmer members and hedges it on the CME to offset risk and exchange at a later date to the best market we can sell at the time. We have great concern with the CME's request to expand the daily limits on corn from 30 cents to 50 cents. We have excellent price discovery currently and there is no need to increase. We have never tested the expanded limits for day 2 or 3 since it was raised in March 2008. With the extreme volatility we currently have in the markets comes at a price to the hedger. We do not see a need to increase and cost the hedger more risk. The current limits are working well and have never been fully tested.

We believe the expansion of trading hours is of more benefit to the "true" hedger than expanding trading limits.

DERRICK BRUHN

Merchandiser | Topflight Grain Cooperative, Inc.

420 W. Marion :: Monticello, IL 61856

phone :: (217) 762-2163

fax :: (217) 678-8113

email :: dbruhn@topflightgrain.com

web :: www.topflightgrain.com