

# GENEVA

T R A D I N G

December 12, 2013

Via Electronic Submission

Ms. Melissa D. Jurgens  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street NW  
Washington, DC 20581

RE: Concept Release on Risk Controls and System Safeguards for Automated Trading Environments, RIN 3038-AD52; 78 FR 56542

Dear Ms. Jurgens:

Geneva Trading USA, LLC (“Geneva Trading”) appreciates the opportunity to provide input on the Commodity Futures Trading Commission’s (“CFTC”) Concept Release on Risk Controls and System Safeguards for Automated Trading Environments published on September 12, 2013 (the “Concept Release”). Geneva Trading is a principal trading firm based in Chicago, Illinois, (and a member of the Futures Industry Association Principal Traders Group) and trades electronically on exchanges throughout the world. Geneva Trading feels strongly that coherent, principle-based controls and safeguards for automated trading are critical to the ongoing effort to provide transparent, liquid markets and efficient price discovery.

To that end, Geneva Trading strongly supports and agrees with the comprehensive response to the Concept Release submitted by the Futures Industry Association to the CFTC on December 11, 2013. We believe the FIA’s response provides a rational, data- and fact-driven roadmap for best practices regarding market infrastructure, risk controls and automated trading system safeguards.

Geneva Trading greatly appreciates the opportunity to submit our views on these important issues before the CFTC. Do not hesitate to contact us if you have any questions regarding the comments in this letter.

Sincerely,



Robert S. Creamer  
President and CEO  
Geneva Trading USA, LLC