



February 10, 2014

Melissa D. Jurgens
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Via Online Submission

SUBJECT: RIN 3038-AD82 Aggregation of Positions

Dear Secretary Jurgens:

The Minneapolis Grain Exchange, Inc. ("MGEX" or "Exchange") would like to thank the Commodity Futures Trading Commission ("CFTC" or "Commission") for the opportunity to respond to the Commission's request for comment on the above referenced Notice of Proposed Rulemaking entitled "Aggregation of Positions" published in the November 15, 2013 Federal Register Vol. 78 No. 221 ("Proposed Rule").

MGEX is both a Designated Contract Market ("DCM") and a Derivatives Clearing Organization ("DCO"). MGEX appreciates the Commission's extension of the comment period in this matter as the proposed rulemakings on Aggregation of Positions and Position Limits are inextricably linked.

In general, MGEX is supportive of the Commission's clarifications and added exemptions contained in the Proposed Rule as compared to the original 2011 proposal. It is encouraging to see that the CFTC weighed the comments received in 2011 and adjusted the Proposed Rule so as to include additional exemptions for situations where the sharing of information would create risk of violating applicable laws or regulations. Furthermore, MGEX is pleased to see the increase from a 10% ownership threshold to 50% in regards to applicable exemptions from aggregation.

Please feel free to contact me with any questions.

Regards,

A handwritten signature in black ink, appearing to read "Athena R. Elias".

Athena R. Elias
Associate Corporate Counsel