

Christopher Kirkpatrick, Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581
United States
www.cftc.gov

Chris Barnard
Germany

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- **17 CFR Part 1**
- **RIN Number 3038-AE22**
- **Residual Interest Deadline for Futures Commission Merchants**

Dear Mr. Kirkpatrick.

Thank you for giving us the opportunity to comment on your Notice of proposed rulemaking on Residual Interest Deadline for Futures Commission Merchants.

You are proposing to revise the Residual Interest Deadline in Commodity Futures Trading Commission (CFTC) Rule 1.22. The amendment would remove the December 31, 2018 termination date for the phased-in compliance schedule for futures commission merchants (FCMs) and provide assurance that the Residual Interest Deadline would only be revised through a separate CFTC rulemaking.

I support these proposals in principle, as they provide the CFTC with more flexibility to consider the issues, including costs and benefits, of revising the Residual Interest Deadline. Despite this, I would ask you to provide some certainty around the proposed regulatory timeframe, as the proposals as written simply state that the Residual Interest Deadline is 6:00 p.m. Eastern Time on the Settlement Date until the CFTC takes further action through rulemaking, which is just open-ended.

Yours sincerely

C.R.B.

Chris Barnard