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January 13, 2015

Mr. Christopher Kirkpatrick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581

RE: Residual Interest Deadline for Futures Commission Merchants. Federal Register/Vol. 79, No. 220/November 14, 2014 (RIN 3038-AE22).

Dear Mr. Kirkpatrick:

On behalf of the more than two million farmers and ranchers who belong to one or more farmer cooperative(s), the National Council of Farmer Cooperatives (NCFC) submits the following comments in response to the Commodity Futures Trading Commission's (Commission) notice of proposed rulemakings: *Residual Interest Deadline for Futures Commission Merchants* (RIN 3038-AE22).

Since 1929, NCFC has been the voice of America's farmer cooperatives. Our members are regional and national farmer cooperatives, which are composed of over 2,500 local farmer cooperatives across the country. As processors and handlers of commodities, farmer cooperatives – and their farmer-owners – rely on futures markets to hedge the commercial risk inherent to agricultural production, processing and marketing. In addition, there are cooperatively-owned futures commission merchant (FCM) operations that are relatively small and serve a customer base comprised of physical commodity hedgers.

Given our concerns over increased costs for hedgers and operational burdens on small FCMs that shortening the Residual Interest Deadline from 6 p.m. Eastern Time on the Settlement Date, NCFC appreciates and supports the Commission's proposal to revise the Residual Interest Deadline in Commission Rule 1.22. The amendment would remove the December 31, 2018 termination date for the phased-in compliance schedule for FCMs (which would have, without further Commission action, changed the Residual Interest Deadline from 6:00 p.m. Eastern Time on the Settlement Date to time of settlement). In addition, NCFC supports the proposed revision to Regulation 1.22 that would require a separate Commission rulemaking to make any subsequent changes to the Residual Interest Deadline.

We appreciate this opportunity to support the proposed revisions to Commission Rule 1.22.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles F. Conner".

Charles F. Conner
President & CEO