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January 17, 2015

Christopher Kirkpatrick, Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street N.W.
Washington, D.C. 20581

Re: Speculative Position Limits/Bona Fide Hedging Definition

Prairie Central Cooperative is a farmer owned country grain elevator company. We operate 10 country grain elevators located in Mclean and Livingston counties and are headquartered in Chenoa, Illinois. We are owned by the 1,200 local farmer patrons of this now over 100 year old agricultural cooperative.

Our cooperative uses the commodity futures and options market (corn, soybeans, wheat) each business day to hedge and greatly reduce price risk and exposure.

- Thousands of U.S. farmer and agribusiness firms rely on many types of hedging transactions to manage risk appropriately in their daily business operations. The CFTC-proposed rule unnecessarily and dramatically narrows the range of hedging transactions that would be considered bona fide hedges.
- Many hedging transactions employed for decades by the industry, and historically considered bona fide by the commission, would be outside the new proposed definition.



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- In particular, anticipatory hedging is very important to our daily business and must be maintained as bona fide hedging. Examples of hedging strategies that could be at risk include:
 - Pre-hedging purchases of producer grain outside trading hours of a futures exchange, but part of our grain elevator hours of operation.
 - Pre-setting futures carrying charges to manage spread risk.
- Restricting the use of long-accepted strategies will increase costs of hedging for business risk management and ultimately will lead to lower bids to our producers and higher consumer prices.

In addition, the National Grain and Feed Association (NGFA) submitted comments dated February 10, 2014 and August 4, 2014. In each of these comments, it describes in greater detail and numerous examples of transactions that could be affected adversely if the proposal is adopted as written.

Sincerely,

Mark Heil

Mark Heil
General Manager
Prairie Central Cooperative, Inc.