

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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**- Industry Filing IF 14-006
- Requesting Public Comment on Related Applications Submitted by
LedgerX, LLC for Registration as a Derivatives Clearing Organization
and Swap Execution Facility**

Dear Mr. Kirkpatrick.

Thank you for giving us the opportunity to comment on the Industry Filing and Related Applications Submitted by LedgerX, LLC for Registration as a Derivatives Clearing Organization and Swap Execution Facility.

I am excited by the speed of development in Bitcoin markets and Bitcoin utility, and appreciate the work that has gone into this concept and application. However, the current early stage of, and speed of Bitcoin development coupled with uncertainties around Bitcoin use and security require much more specific data, questions and answers before I could support this application. In particular:

- How is Bitcoin classified? Is it a commodity, a currency or other?
- How deep and liquid is the Bitcoin market, and how is this expected to develop over time?
- How can we ensure objective Bitcoin pricing? Who or what will determine this? What is the role of derivatives in aiding Bitcoin price discovery?
- What is the extent of financial resources available for the proposed DCO? Is this sufficient given the high volatility in observed Bitcoin prices?
- How secure from theft, fraud and volume / price manipulation are Bitcoins, and how would this affect Bitcoin derivatives pricing and collateralization?

One final comment I would make is that some of the application material was a bit "thin". I would expect more details and concrete information concerning e.g. collateralization and complying with DCO financial resources requirements.

Please note that the comments expressed herein are solely my personal views

Yours sincerely

C.R.B.

Chris Barnard