



March 27, 2015

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

VIA ONLINE SUBMISSION

Re: Notice of Intent to Renew Collection 3038-0076, Risk Management Requirements for Derivatives Clearing Organizations (“DCOs”)

Dear Secretary Kirkpatrick:

The Minneapolis Grain Exchange, Inc. (“MGEX”) would like to thank the Commodity Futures Trading Commission (“Commission” or “CFTC”) for the opportunity to respond to the Commission’s request for public comment on the above referenced matter published in the January 26, 2015 Federal Register Vol. 80, No. 16. MGEX previously submitted comment on the Commission’s request for comments regarding DCO financial resource reporting requirements by letter dated December 31, 2014. MGEX is both a Subpart C DCO and a Designated Contract Market, and is therefore subject to the financial resource reporting requirements set forth in Part 39 of the CFTC Regulations.

MGEX believes that the information on financial resources currently reported to the CFTC each quarter pursuant to Part 39 is more than sufficient for the Commission’s oversight. Should the CFTC consider potential changes to these financial reporting requirements or to the method by which such information is submitted and collected, MGEX respectfully requests that the CFTC avoid a standardized “one size fits all” approach to financial reporting. Particularly given the varying sizes of existing DCOs, MGEX believes it is important for the Commission to be flexible with regard to the format and method of collection of financial information, so long as all pertinent information is obtained. Although MGEX recognizes that the development of automated electronic or other technological collection techniques may have certain advantages, mandating that all DCOs use one method could prove impractical and may, in fact, increase the burden of collecting information rather than minimizing it for DCOs. In addition, when considering follow-up matters to submitted financial information, MGEX urges the Commission to carefully consider the materiality of any requests and whether such requests are necessary for the proper oversight by the Commission.

Thank you again for the opportunity to comment, and please feel free to contact MGEX with any further questions.

Sincerely,

A handwritten signature in cursive script that reads "Lindsay Hopkins". The signature is written in black ink and is positioned below the word "Sincerely,".

Lindsay R. Hopkins
Clearing House Counsel