



March 30, 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 3038-0069, Information Management Requirements for Derivatives Clearing Organizations (“DCOs”)

Dear Secretary Kirkpatrick:

The Minneapolis Grain Exchange, Inc. (“MGEX” or “Exchange”) 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 28, 2015 Federal Register Vol. 80, No. 18. MGEX is both a Subpart C DCO and a Designated Contract Market, and is therefore subject to the reporting and recordkeeping requirements relating to information management for DCOs set forth in Part 39 of the CFTC Regulations.

The Exchange believes that the current collection of information by the CFTC pursuant to Part 39 is more than sufficient for the Commission’s oversight of DCOs. In the event that the CFTC considers changing any of the reporting or recordkeeping requirements or the method by which such information is submitted and collected, MGEX respectfully requests that the Commission avoid a standardized “one size fits all” approach. 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 information, so long as all pertinent information is obtained, as mandating one method could increase the burden of collecting information rather than minimizing it for DCOs.

The Exchange also recognizes that future CFTC rulemakings could impose additional reporting and recordkeeping requirements on DCOs. When considering any such potential rulemakings, MGEX would therefore similarly urge the Commission to be cognizant of the fact that a one size fits all approach may not be the most effective and could even be harmful to smaller DCOs.

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

Sincerely,

A handwritten signature in black ink that reads "Lindsay Hopkins". The signature is written in a cursive, flowing style.

Lindsay R. Hopkins
Clearing House Counsel