



November 13, 2015

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

**VIA ONLINE SUBMISSION**

Re: Aggregation of Positions, RIN 3038-AD82

Dear Secretary Kirkpatrick:

The Minneapolis Grain Exchange, Inc. ("MGEX") would like to thank the Commodity Futures Trading Commission ("CFTC") for the opportunity to respond to its Supplemental Notice of Proposed Rulemaking for the above listed proposed rule, as published in the September 29, 2015 Federal Register Vol. 80, No. 188. MGEX has previously submitted comment on the CFTC's Notice of Proposed Rulemaking regarding aggregation of positions (the "Proposed Rule") by letter dated February 10, 2014.

MGEX is both a Subpart C Derivatives Clearing Organization and a Designated Contract Market, and has been the primary marketplace for North American Hard Red Spring Wheat since its inception in 1881.

MGEX applauds the CFTC's supplemental proposal to streamline the aggregation standards by allowing market participants with more than 50% ownership in a firm to rely on a notice filing for a waiver of aggregation requirements. This is a positive step to recognize industry realities and avoid needless work and uncertainty. A notice filing system is more efficient for both market participants and the CFTC, and MGEX encourages the CFTC to explore further use of this system in future rulemakings.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Aaron Nyquist".

Aaron C. Nyquist  
Assistant Corporate Counsel