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- **17 CFR Part 3**
- **RIN Number 3038-AE56**
- **Chief Compliance Officer Duties and Annual Report Requirements for Futures Commission Merchants, Swap Dealers, and Major Swap Participants; Amendments**

Dear Mr. Kirkpatrick.

Thank you for giving us the opportunity to comment on your proposed rule on Chief Compliance Officer Duties and Annual Report Requirements for Futures Commission Merchants, Swap Dealers, and Major Swap Participants; Amendments.

The Commodity Futures Trading Commission (Commission or CFTC) is proposing to amend its regulations regarding certain duties of chief compliance officers (CCOs) of swap dealers (SDs), major swap participants (MSPs), and futures commission merchants (FCMs) (collectively, Registrants); and certain requirements for preparing and furnishing to the commission an annual report containing an assessment of the Registrant's compliance activities.

I support these proposed amendments. In particular, proposed § 3.1(j) would define "senior officer" as "the chief executive officer or other equivalent officer of a registrant". This is a welcome definition of senior officer that provides provide greater clarity regarding the CCO reporting line required by CEA section 4s(k)(2)(A) and § 3.3(a)(1) of the Commission's regulations. Furthermore, the proposed definition is consistent with the SEC's definition of senior officer in SEC rule 15Fk-1(e)(2). This amendment therefore promotes regulatory consistency and should enhance CCO independence and effectiveness.

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

Yours sincerely

C.R.B.

Chris Barnard