



June 24, 2017

Via Electronic Submission

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

Re: Notice of Proposed Rulemaking on Chief Compliance Officer Duties and Annual Report Requirements for Futures Commission Merchants, Swap Dealers, and Major Swap Participants; Amendments, RIN 3038-AE56

Dear Mr. Kirkpatrick:

Automated Compliance Management, LLC (“ACM”) is a leader in providing automated compliance solutions to a number of Commission Registrants. We support any rule that streamlines and/or harmonizes rules of other regulators; however, we seek clarification from the Commission regarding the effect of eliminating the requirement to address *“each applicable requirement under the Act and Commission regulations”* in the CCO Annual Report.

Currently the Registrants that use our product on an annual basis obtain sub-certifications from the subject matter experts within the firm of each applicable requirement under the Act and Commission regulations. As no similar provision exists in the regulations, is it the intent of the Commission to eliminate the requirement in its entirety? We ask that the final rule clarify whether this change is intended to eliminate this process as a requirement for signing the CCO Annual Report.

Sincerely,

Kassey Oulhadj

Managing Director

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