

# Kramer Levin

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## VIA CFTC COMMENTS PORTAL

(<https://comments.cftc.gov>)

Mr. Christopher Kirkpatrick  
Secretary  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, D.C. 20581

Re: RIN 3038-AE76 – Registration and Compliance Requirements for  
Commodity Pool Operators and Commodity Trading Advisors

Dear Mr. Kirkpatrick:

The Commodity Futures Trading Commission (“CFTC” or “Commission”) has requested comments on the Proposed Rule<sup>1</sup> providing registration relief for various persons who, without the implementation of the Proposed Rule, might otherwise be required to register as a Commodity Pool Operator (“CPO”) and/or Commodity Trading Advisor (“CTA”).

We have many family office clients and believe there is a benefit in formalizing and codifying the Family Office exemptions set forth in the Proposed Rule.

We support the adoption of the Proposed Rule for the reasons set forth and with the modifications proposed in the comment letter submitted by The Private Investor Coalition, Inc. on November 28, 2018.

Thank you for your consideration of these comments.

Sincerely,



Christopher S. Auguste

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<sup>1</sup> Registration and Compliance Requirements for Commodity Pool Operators and Commodity Trading Advisors, Notice of Proposed Rulemaking, 83 FR 52902 (October 18, 2018) (the “Proposed Rule”).