

MARSHALL STREET

— C A P I T A L —

December 13, 2018

Via CFTC Comments Portal

<https://comments.cftc.gov>

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

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

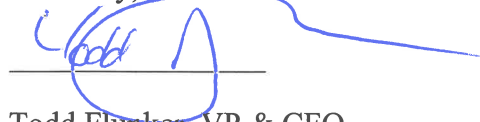
Dear Mr. Kirkpatrick:

The Commodity Futures Trading Commission (“CFTC” or “Commission”) has requested comments on the Proposed Rule¹ 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 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,



Todd Flunker, VP & CFO

¹ 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”).