

Christopher Kirkpatrick, Secretary
Commodity Futures Trading Commission
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- **17 CFR Part 4**
- **RIN Number 3038-AE98**
- **Amendments to Compliance Requirements for Commodity Pool Operators on Form CPO-PQR**

Dear Mr. Kirkpatrick.

Thank you very much for giving us the opportunity to comment on your notice of proposed rulemaking on Amendments to Compliance Requirements for Commodity Pool Operators on Form CPO-PQR.

The Commodity Futures Trading Commission (CFTC) is proposing amendments to agency regulations on Commodity Pool Operators. Specifically, the proposal would eliminate the pool-specific reporting requirements in existing Schedules B and C of Form CPO-PQR, other than the pool schedule of investments, and amend the information in existing Schedule A of the form to request Legal Entity Identifiers (LEIs) for commodity pool operators (CPOs) and their operated pools that have them, and to eliminate questions regarding pool auditors and marketers. All CPOs would be required to file the resulting amended Form CPO-PQR quarterly, but would also be allowed to file NFA Form PQR, a comparable form required by the National Futures Association (NFA), in lieu of filing the revised Form CPO-PQR. Relatedly, the CFTC would also no longer accept filing Form PF in lieu of the revised Form CPO-PQR. The CFTC believes that these amendments would focus Form CPO-PQR on data elements that facilitate the CFTC's oversight of CPOs and their pools in connection with its use of other CFTC data streams and regulatory initiatives while reducing overall data collection requirements for market participants.

I support these proposals that will simplify CPO reporting requirements and reduce reporting burdens for market participants, with no loss of regulatory amenity in other areas. I further agree with the proposal to require all CPOs to file the revised Form CPO-PQR on a quarterly

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

basis, which will formalize the current effective reporting schedule for smaller CPOs. In summary the proposals should improve market efficiency while allowing the CFTC to maintain its strong oversight of CPOs and their businesses.

Yours sincerely

C.R.B.

Chris Barnard