From: Tim Skallet <timskallet@gmail.com>
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To: secretary@CFTC.gov>

Subject: Regulation of Retail Forex

RIN 3038-AC61

Please remove the 10:1 leverage limitation. I'm all for anti-fraud authorities and NFA registrations, but the only thing this leverage reduction will do is force MANY retail forex traders to open "overseas" accounts in search of more flexible leverage, in which case may drive that business to unregulated dealers, where there is even less or no oversight.

Who will gain from this? Most likely the non-U.S. brokers.

GFT, Oanda, IBFX, Gain Capital, FXCM, FX Solutions, FXDD, PFG Best and CMS Forex consider that if the proposal passes:

- 90% of the account will go offshore, mostly to the United Kingdom
- Thousands of high educated jobs will be lost
- An industry worth over \$1 billion gone, loosing millions in taxable revenue.
- The proposal does not fix fraud, the subject the rule tries to adjust. Battle against unlicensed FDMs and IBs fix the fraud, not 10 to 1 leverage.
- 100 to 1 leverage is very popular. Traders simply will not accept 10 to 1 leverage.
- Unregulated dealers from around the world will also benefit.

Conclusion: Thousands of jobs lost when unemployment is at 10%, consumers more vulnerable to fraud, and the United States tosses away one of the most promising export industries.

Signed,

Tim Skallet