

From: Robert Danielson <rdanielson.usa@gmail.com>
Sent: Monday, February 1, 2010 1:12 PM
To: secretary <secretary@CFTC.gov>
Subject: Regulation of Retail Forex

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This message is to inform you of our opinion regarding the proposed changes to margin requirements for forex trading and the expected impact on our company. We are a new business with a business plan model which forecasts 8 to 10 new employee hires in the next 12 months. The new margin requirement proposal of 10:1 would greatly increase our capital costs, which when applied to our model, cuts our new hire forecasts from 8-10 to 1-2.

Our business does not look at the 400:1 or 500:1 brokers. Our model runs at a 100:1 margin requirement. We have plugged in a 50:1 margin requirement and believe we can still operate at this level. However at 10:1 it not only forces us to eliminate up to 8 new jobs, it also forces us to look off-shore for better terms. While we understand the need for regulatory restrictions, we believe the proposed attempt to lower margin requirements to 10:1 is extremely detrimental to businesses with good financial models and structured operating procedures. Please do not hamper jobs and economic growth by strangling us with restrictions that are anti-stimulus.

We ask you reconsider this proposal by defining a margin requirement level that accomplishes the regulatory goals without hampering jobs and economic growth.

Thank you for considering our comments,

Robert Danielson
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