

From: kevin koch <kdk2k@hotmail.com>
Sent: Sunday, March 7, 2010 2:55 AM
To: secretary <secretary@CFTC.gov>
Subject: Regulation of Retail Forex -- Concerns

Dear Secretary Stawick,

I would like to express some concern about modifications to the leverage ruling on OTC currency contracts. One of my brokers gave me the following number to quote: RIN-3038-AC61. I currently trade currencies and futures but use to be a commodities / currency hedge fund risk manager.

I am aware of the risks. I can understand the CFTC's concern for retail clients with 100 times leverage and I would never run with this much leverage. However, 10 times leverage bringing it to the same as futures would not make sense for me to continue trading these. As a risk manager, I learned a lot about counterparty risk and those risks are much greater with OTC than with required futures clearing. This ruling would move me to close my retail FX account and trade my currencies on the futures exchange. If the purpose is to stop all OTC retail trading than this is a good course of action; otherwise moving the leverage to say 20 times max may be more reasonable.

Sincerely,

Kevin D. Koch

Your E-mail and More On-the-Go. Get Windows Live Hotmail Free. [Sign up now.](#)