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OFFICE OF THE SECRETARIAT

March 27, 2000

Ms. Jean Webb  
Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street N.W.  
Washington, D.C. 20581

**COMMENT**

RE: Merchants' Exchange of St. Louis

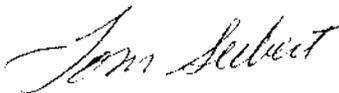
Dear Ms. Webb:

I understand that the Merchants' Exchange of St. Louis is proposing to the CFTC to trade barge freight futures. I would like to voice my support for their proposal.

Roquette America, Inc., for whom I work, is involved in the corn wet milling business. By the nature of our business we are regular users of barge freight to transport our product to New Orleans for export. The proposed barge freight futures would allow us to fully hedge our transportation needs. With the consolidation of the barge industry we find this a larger need than in previous years. A futures market for barge transportation would greatly enhance the competitiveness of the industry.

Again, we voice our support for the establishment the barge freight futures contract proposed by the Merchants' Exchange.

Sincerely,



Tom Seibert  
Senior Manager, Grain Department  
Roquette America, Inc.  
1417 Exchange Street  
Keokuk, Iowa 52632

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