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COMMENT

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Ms. Jean A. Webb
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street N.W.
Washington, D.C. 20581

OFFICE OF THE SECRETARIAT

Re: Merchants Exchange of St. Louis

Dear Ms. Webb,

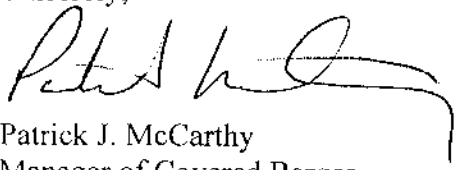
MEMCO Barge Line, Inc. has had conversations with members of the Merchants' Exchange of St. Louis & also Mr. Martin Murray of the CFTC regarding the Barge Freight Futures contract proposal that is now before the CFTC. We are writing to state our full support of this Futures contract.

We are a river transportation provider and a large owner of boat and barge assets. Specifically, we support the proposal in order to hedge price variations in barge freight and lock in returns for our asset base. In addition we like the liquidity and anonymity that that type of tool would provide.

MEMCO is a long-term player in this particular market and embraces the price discovery and hedging ability that is needed in the grain markets.

We would appreciate knowing any developments and look forward to being a part of this important new tool.

Sincerely,



Patrick J. McCarthy
Manager of Covered Barges
MEMCO Barge Lines, Inc.

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