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NFA NATIONAL FUTURES ASSOCIATION
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August 28, 2000

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OFFICE OF THE SECRETARIAT

Ms. Jean A. Webb
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, Dc 20581

COMMENT

Re: Profile Documents for Commodity Pools


Dear Ms. Webb:

In the July 27, 2000 Federal Register, the Commodity Futures Trading Commission published proposed amendments to its regulations and NFA rules which provide relief from the Commission's requirement that a disclosure document be delivered prior to a Commodity Pool Operator ("CPO") soliciting a prospective customer. In lieu of the disclosure document, the proposal would allow a CPO to deliver a profile document, as defined under NFA Rules, to the prospective customer. NFA welcomes this opportunity to comment in support of this proposal.

NFA and the Commission have worked together in recent years to improve the disclosure scheme in the futures industry by developing disclosure formats which present information in a concise and readable manner. NFA believes that the profile document is another step in improving disclosure. As the Commission noted in the Federal Register release, the profile document gives prospective participants succinct disclosure of key aspects of a commodity pool offering in an easily accessible format. The profile document also enhances a prospective participant's ability to evaluate the key characteristics of a commodity pool before making an investment decision. Importantly, however, the profile may be used for initial solicitations only – the CPO is still required to provide the full disclosure document before accepting any funds for investment.

In summary, the profile document will improve the disclosures available to prospective participants without sacrificing any of the protections under the Commission's regulations. NFA encourages the Commission to adopt NFA's proposed amendments to Rule 2-35 and accompanying amendments to the Commission's regulations

Sincerely,



Daniel J. Roth
Executive Vice President
and General Counsel

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