

HG

02-8

(5)

HUDSON CAPITAL GROUP, L.L.C.
ONE NORTH END AVENUE
SUITE ~~1219~~ 904
NEW YORK, NY 10282
PHONE (212) 766-2780 FAX (212) 766-2788

**Received CFTC
Records Section
10/11/02**

September 27, 2002

COMMENT

Office of the Secretariat
Commodity Futures Trading Commission
3 Lafayette Center
1155 21st Street – North West
Washington, DC 20581

To Whom It May Concern:

As a member of the New York Mercantile Exchange (“NYMEX”), and a principal of an options trading group, I strongly support the petition to allow NYMEX members to trade over the counter “OTC” energy products. This vehicle will allow greater liquidity to those who have exposure to energy prices while mitigating credit exposure.

The ability to trade these products would greatly enhance my business, and help to create jobs at the Exchange in Lower Manhattan.

I am certain that many other traders feel this way at NYMEX.

Sincerely,



Todd Gross
Managing Member

Cc: James E. Newsome, Chairman, CFTC
Vincent Viola, Chairman, NYMEX
Robert Collins, President, NYMEX
Neal Wolkoff, Executive VP, NYMEX