



FRONTIER RISK MANAGEMENT, INC.

WILLIAM H. PLUMMER
PRESIDENT

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COMMENT

OFF. OF THE SECRETARIAT

Jean A. Webb
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street N.W.
Washington, DC 20581

**Received CFTC
Records Section**

11/20/2002

Dear Secretary,

Frontier Risk Management, an Introducing Broker of Refco, LLC, opposes the proposed amendment to eliminate the "scale down" limit of 600 contracts, and require that speculative positions be reduced immediately to 300 contracts as of the close of business on the first business day following the first Friday of the contract month.

Moreover, Frontier opposes any changes to any Live Cattle contract specifications or position limits once a contract has been listed and has commenced trading.

Respectfully,

William H. Plummer
President, Frontier Risk Management