

04-4
①

Warfield, Sauntia

RECEIVED
C.F.T.C.

From: secretary
Sent: Tuesday, June 01, 2004 8:29 AM
To: Webb, Jean A.; Colbert, Edward W.; Warfield, Sauntia
Subject: FW: Proposed Changes for CFTC Large Trader Reporting

2004 JUN -1 AM 9: 21

-----Original Message-----

From: John.Munro@ranincusa.com [mailto:John.Munro@ranincusa.com]
Sent: Friday, May 28, 2004 5:44 PM
To: secretary@cftc.gov
Subject: Proposed Changes for CFTC Large Trader Reporting

COMMENT

Re: 17 CFR Parts 15, 16, 17, 18, 19 and 21
RIN 3038-AC08
Reporting Levels and Recordkeeping

Rolfe and Nolan provides record-keeping and regulatory reporting functions for a substantial number of FCMs, both here in the U.S. and abroad. Included in those functions are Large Trader reporting to the CFTC and to the domestic exchanges. The proposed changes regarding aggregation of EFS, EFR and EFO volume with EFP transactions will require programming modifications to our systems to enable our clients to comply with the new regulations.

Due to the time necessary to design, program, test and deliver these modifications, we request that the Commission allow at least 90 days after the finalization of the rules for FCMs to comply.

Thank you.

John Munro
SVP Product Design
Rolfe and Nolan Systems Inc
Chicago
312-612-7910

RECEIVED
C.F.T.C.
2004 JUN -1 PM 3: 23
RECORDS SECTION