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April 14, 2005

VIA ELECTRONIC MAIL: Secretary@cftc.gov

Ms. Jean A. Webb
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

COMMENT

OFC. OF THE SECRETARIAT

2005 APR 15 AM 7:38

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Re: Proposed Revision of Federal Speculative Position Limits

Dear Ms. Webb,

Rotella Capital Management, Inc is grateful for the opportunity to provide its comments on the Commodity Futures Trading Commission ("CFTC") proposed rulemaking to increase Federal speculative position limits for all single-month and all-months-combined positions. We support the CFTC's proposal and believe it is an important first step towards greater reform in liberalizing Federal speculative position limits.

If you have any questions regarding these comments or would like to discuss them, please call me at (425) 522-1700.

Sincerely,