

January 25, 2006

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VIA E-MAIL

Jean A. Webb
Secretary
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street, NW.,
Washington, DC 20581

JAN 25 PM 4:55
COMM. OF FUTURES & COMMODITIES

COMMENT

RECEIVED
C.F.T.C.
JAN 25 PM 5:39
RECORDS SECTION

RE: CFTC Request for Comment on "Self-Regulation and Self-Regulatory Organizations in the Futures Industry"

Dear Ms. Webb:

J.P. Morgan Futures Inc. ("JPMFI") is responding to the Commission's request for comment on "Self-Regulation and Self-Regulatory Organizations in the Futures Industry". We thank the Commission for the opportunity to comment on this important topic.

JPMFI was one of the firms that actively participated in the preparation of the letter filed by the Futures Industry Association, and we support the views detailed in that letter. We believe the FIA letter sets forth viable suggestions to address conflicts of interest faced by SROs, particularly with respect to independent directors and the composition of disciplinary panels.

JPMFI likewise concurs with the comments of the FIA that the Commission should have and exercise the authority to review and approve a limited class of SRO rules (including interpretations). Commission review and approval of such rules would foster continued confidence in the impartiality of SRO rulemaking and would protect against undue influence that could be exercised by those having conflicts of interest. This is especially the case given the ever increasing competition faces by SROs.

Thank you for the opportunity to respond to the Request for Comment. Please contact me at 212-623-3391 or sturm_david@jpmorgan.com should you have any questions.

Sincerely,

Managing Director