

Received CFTC  
Records Section

6/26/06

06-3  
③

secretary

**From:** Keith Fitschen [kfitsche@concentric.net]  
**Sent:** Monday, June 26, 2006 7:23 AM  
**To:** secretary  
**Subject:** COT Reports

COMMENT

I use the CFTC COT reports for trading and applaud the on-going effort to improve them. The improved frequency and timeliness over the years has definitely made them more useful. Once a week is certainly often enough, in my opinion, to get a picture of what the groups are doing. Any reduction in the three-day delay in reporting would be a very useful addition.

The one change I would welcome is the elimination of "holes" due to 20 or more traders not holding positions above the reporting levels. Some of the thinner commodities have a number of consecutive reports, then no report when the 20-trader criterion is not met. As you've already collected the data, why not publish it? When open interest dies down to the level where it's not likely the criterion will be met again, then stop reporting.

Thank you for this extremely useful information.

Keith Fitschen

RECEIVED  
JUN 26 2006 8:01  
U.S. DEPT. OF THE TREASURY