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COMMENT (22)

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2502 Laurel Lane  
Wilmette, IL 60091

Ms. Brooksley Born, Chairperson  
Commodity Futures Trading Commission  
1155 21<sup>st</sup> Street, N.W.  
Washington, DC 20581

April 22, 1998

Dear Ms. Born:

This is to provide comments on the application of Cantor Financial Futures Exchange, Inc. (CFFE) to be designated as a CFTC approved market in the U.S. Treasury Futures.

I do not think that CFFE application meets the necessary standards of the CFTC, or even good business practices, to provide the required customer safeguards that would enable them to operate as a sanctioned futures exchange.

I believe the CFFE application has numerous problems:

- **Conflicts of Interest** - If Cantor owns the exchange, runs the exchange, uses the exchange for itself and its customers, and polices the exchange, the potential for conflict of interest is great.
- **CFTC Trading Standards/Audit Trails** - As I understand them CFFE Does not meet the CFTC's standards to provide the necessary customer safeguards in these areas.
- **Clearing Standards** - Little is known on their clearing house. To put the U.S. Treasury Futures Market in this type risk situation is very dangerous.

Overall, I believe that the CFFE application is grossly deficient and should not be approved.

Sincerely,



Daniel R. Glynn