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April 21, 1999

BY TELEFAX (202-418-5521) (2 pages)

Jean A. Webb  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, DC 20581

COMMENT

Re: Proposed Rule 30.11, Regarding Access to Automated Boards of Trade

Dear Ms. Webb:

The Committee on Derivatives and Futures Law (the "Committee") of the New York State Bar Association (the "Bar Association") requests an extension of the deadline for comments on the Commission's notice of proposed rule making regarding Access to Automated Boards of Trade published in the March 24, 1999, Federal Register (Vol. 64, No. 56). At the Committee's most recent meeting (4/20/99), the proposed rule changes were the subject of discussion for the first time and the Committee decided that it would like to comment on the jurisdictional aspects of the proposed rule changes. Since we will not be able to draft a Committee comment letter by the April 23, 1999 deadline, we seek an extension of the comment deadline for sixty days.

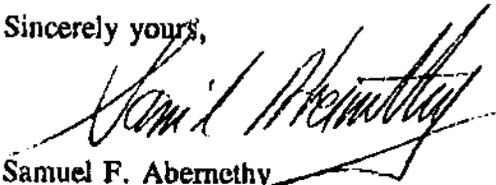
The Bar Association is comprised of approximately 60,000 attorneys licensed to practice in New York, and the Committee includes 50 attorneys in private practice, government, corporations, and academia. They represent or have an interest in commodity and derivatives industry institutions and individuals, including futures commission merchants, floor brokers, floor traders, customers, commodity pool operators, commodity trading advisors, banks, investment banks, and commercial operators in the cash and futures business. The views expressed in this comment letter are those of the Committee and should not be imputed to the Association as a whole.

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Jean W. Webb, Secretary  
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We look forward to a favorable response and appreciate the Commission's consideration of this request.

Sincerely yours,



Samuel F. Abernethy  
Chair

SFA:vkd