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OFFICE OF THE SECRETARIAT**COMMENT**

November 1, 1999

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

BY FIRST CLASS MAIL
RETURN RECEIPT REQUESTED
Z 153 856 982

Dear Ms. Webb:

Federal Register release number 99-035 and Federal Register release number 99-036 ("the releases"), which the Commodity Futures Trading Commission ("CFTC") published in the Federal Register on September 30, 1999, provide for comments to be submitted in response to the releases. For purposes of commenting on the releases, I submit this letter in my official capacity as the President of American Federation of Government Employees Local 3827 ("the union"). The union is the exclusive representative of all employees in the bargaining unit consisting of professional employees working in CFTC's Eastern Regional Office in New York City. A copy of the releases, which I obtained from the CFTC's INTRANET, are enclosed for reference.

COMMENT 1: REQUEST FOR EXTENSION OF TIME TO COMMENT

I have read the releases. I have also made an effort to read the Privacy Act itself, in order to identify the exact language in the Privacy Act which the releases affect. After reading the releases and the Privacy Act itself, I believe that the bargaining unit needs additional time sufficient to seek the advice of its counsel. Without such additional time to seek counsel and to communicate among its members, the bargaining unit is simply not able to inform itself adequately about the impact of the releases. Clearly, comments which are not adequately informed are not useful to the Commission, and also expose the bargaining unit to making unfounded representations at this point.

COMMENT 2: REQUEST FOR NEGOTIATION WITH THE UNION

I believe that the releases involve matters which are appropriate for consultation and negotiation between CFTC and the union. As provided by CFTC's agreement with the union, I request that CFTC honor its obligation to negotiate with the union where matters are appropriate for

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consultation and negotiation. I request that you treat this comment letter, standing alone, as a sufficient exercise of the union's right to negotiate with respect to the releases. To exercise further the union's right to negotiate with respect to the releases, I have provided a separate letter which expressly states the union's request in this regard. A copy of that separate letter, which is sent under separate cover to Mr. Donald Tendick, is attached for reference.

Thank you for your attention to these matters. I appreciate your response.

Very truly yours,



Alfonso A. Holston, President
American Federation of Government Employees--
Local 3827