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OFFICE OF THE SECRETARIAT

COMMENT

November 22, 1999

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

**BY FIRST CLASS MAIL
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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 personal capacity as the president of American Federation of Government Employees Local 3477 ("the union"). The union is the exclusive representative of all employees in the bargaining unit consisting of nonprofessional employees working in CFTC's Eastern Regional Office in New York City.

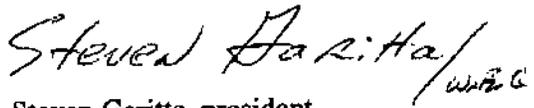
REQUEST FOR EXTENSION OF TIME TO COMMENT

On November 9, 1999, the Equal Employment Opportunity Commission issued a final rule ("final rule") which was published on CFTC's INTRANET site. Issuance of the final rule falls during the extension of the time period provided for the union to submit comments on the releases. Having read the final rule, I find that I must ask for further additional time in order to seek additional counsel about the meaning and significance of the releases in light of the final rule. The final rule is a very substantial document which may impact upon the releases, and vice versa. An additional extension of time is appropriate for the bargaining unit to inform myself properly, and to provide responsive comment.

As was the case in my earlier letter to you dated 11 1 99, my request for this extension of time stands independently from my request for collective bargaining of the releases. My request to negotiate the releases, while mentioned in my earlier letter to you, is the subject of a separate written request.

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

Very truly yours,

A handwritten signature in cursive script that reads "Steven Garitta" followed by a flourish that appears to be "W. G.". The signature is written in black ink on a white background.

Steven Garitta, president
American Federation of Government Employees--
Local 3477