

THE AE CLEARINGHOUSE, LLC
454 WEST BELDEN AVENUE
CHICAGO, IL 60614-3816
773-281-9106 VOX 773-281-7650 FAX

Wednesday, October 5, 2005

VIA EMAIL and FAX

Re: Request for Amended Order of Registration

To the Secretary of the CFTC:

We hereby submit a request for an amended Order of Registration that would allow the AE Clearinghouse, a registered DCO, to clear any and all over-the-counter contracts, agreements, and transactions excluded under Section 2(d) of the Act, and certain contracts, agreements, and transactions executed on a board of trade, exempted under Section 5(d) of the Act, as long as the clearinghouse has collected amounts of money from market participants as initial margin that will be equal to or exceed the maximum loss that can be possibly experienced by the clearinghouse with respect to such a contract, agreement, or transaction.

We also request the Commission to amend the Order of Registration so that the Commission would not require the AE Clearinghouse to establish a "mark" at the end of every business day, or to establish a clearing price limit that moves from "mark" to "mark", or to require variation margins, unless the clearinghouse or another market participant is exposed to credit risk from another market participant, with respect to such a contract, agreement, or transaction.

If you have any questions or require more information, I am happy to respond. Please contact me at 773-281-9106 or contact me by email at adam.burczyk@actuarials.com.

Sincerely,

Adam Burczyk,
General Manager of AE Clearinghouse