

**secretary**

09-33  
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**From:** steve.campbell@ldcommodities.com  
**Sent:** Monday, November 23, 2009 4:30 PM  
**To:** secretary  
**Subject:** Fw: KCBT/KCBTCC Section 4(c) Petition

**COMMENT**

Subject: KCBT/KCBTCC Section 4(c) Petition, 74 FR 58606

To whom it concerns:

Louis Dreyfus Commodities is a major exporter and merchandiser of US Wheat and has been an active participant in the KCBT, CME, MGX wheat futures contracts, for several decades.

We fully support the request from KCBT/KCBTCC to list and clear certain calendar swaps. We believe that by bringing these OTC contracts to a well established, well funded exchange it will strengthen the integrity of the contracts, allow for open competition, and lead to a more efficient marketplace. As a long time futures, cash, and OTC trade house, we very well know and understand the importance of these qualities in developing a transparent, financially sound contract.

In addition, we support the request to commingle customer funds to margin, secure or guarantee the clear-only contracts. KCBT/KCBTCC have maintained a level of integrity for over 150/100 years respectfully, and we feel they are well-qualified to oversee the position concentration, risk management, and financial oversight required.

Respectfully submitted,

Steve Campbell  
Vice President  
Louis Dreyfus Commodities  
816-218-2333

**Received CFTC  
Records Section**

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