

**From:** Stewart Wilcox-Sollof <swsprime@yahoo.com>  
**Sent:** Friday, September 24, 2010 11:47 AM  
**To:** Gensler, Gary <GGensler@CFTC.gov>  
**Cc:** Chilton, Bart <BChilton@CFTC.gov>; Dunn, Michael <MDunn@CFTC.gov>;  
Sommers, Jill <JSommers@CFTC.gov>; O'Malia, Scott  
<SO'Malia@CFTC.gov>; PosLimits <PosLimits@CFTC.gov>  
**Subject:** Revision of Precious Metal COMEX rules

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Dear Chairman Gensler,

Revision of Precious Metal COMEX rules

After reading extensively on what the CFTC has said about revising the COMEX rules and what outside commentators have suggested, I am quite clear in my own mind as to what is necessary. I would summarize my thoughts as follows:

<!--[if !supportLists]-->1. <!--[endif]-->A limit of 1250 contracts or 1% of annual production, whichever is less, should be rigorously enforced.

<!--[if !supportLists]-->2. <!--[endif]-->Only the CFTC may grant exemptions, these exemptions must moderate, fixed, well reasoned, not amendable except by annual review, and most importantly, made public knowledge with the Entity having the exemption named and exemption limit and its reason published. These exemptions should be reviewed every year and revision information placed in the public domain.

<!--[if !supportLists]-->3. <!--[endif]-->Any Entity trading in Precious Metals must not trade for clients and on its own behalf.

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I believe the above simple and straightforward rules would lead to a very level COMEX playing field, which would attract foreign capital into the US COMEX market, rather than drive it away.

<!--[if !supportEmptyParas]--> <!--[endif]-->

Yours Truly,

<!--[if !supportEmptyParas]--> <!--[endif]-->

Stewart Wilcox-Sollof

P.S. I shall copy this to all CFTC Board Members and the Position Limits email.

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The One Percent Solution

I propose that the Commission adopt a hard position limit in the contract equivalent amount of no more than one percent of the world annual production of any commodity of finite supply. This 1% speculative position limit would apply to all related derivatives on an aggregate (across all

markets) and on an all-months-combined basis. No single speculative trading entity could control on a net basis, long or short, a total derivatives position greater than one percent of the annual world production of any commodity. Such a limit would be large enough to accommodate all but a handful of traders in every market. Importantly, such a level, evenly enforced, would make concentration and manipulation impossible. This is the primary mission of the Commission.

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