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MANAGED FUNDS ASSOCIATION

December 21, 2007

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Via Electronic Mail: secretary@cftc.gov

Attention: Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

COMMENT

Re: Proposed Revision of Federal Speculative Position Limits

Ladies and Gentlemen:

Managed Funds Association ("MFA") appreciates the opportunity to make this submission of comments to the Commodity Futures Trading Commission ("CFTC" or the "Commission") on its proposal to revise the speculative position limits for certain agricultural commodities set out in Commission Regulation 150.2 ("Federal speculative position limits"). MFA and its members have long been interested in CFTC market regulation activities, and specifically, Federal speculative position limits.

MFA is the voice of the global alternative investment industry. Its members include professionals in hedge funds, funds of funds and managed futures funds. Established in 1991, MFA is the primary source of information for policymakers and the media and the leading advocate for sound business practices and industry growth. MFA members represent the vast majority of the largest hedge fund groups in the world who manage a substantial portion of the approximately $2 trillion invested in absolute return strategies. MFA is headquartered in Washington, D.C., with an office in New York.

Comments

We commend the Commission for its proposal to increase the Federal speculative position limits for single-month (not including the spot month) and all-months-combined positions in all commodities except Chicago Board of Trade Oats contracts and to aggregate traders' positions in Regulation 150.2 enumerated commodities across multiple designated contract markets ("DCMs") when multiple DCMs list for trading futures contracts that share substantially identical terms for determining compliance with Federal speculative position limits ("Proposal"). We believe that raising the current position limit levels would permit advisors greater flexibility in determining the appropriate positions for the accounts that they manage based on their assessment of profit or risk management opportunities. We note that the Proposal also recognizes the changing characteristics of markets which can allow larger positions to be taken without an adverse impact on price

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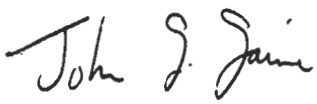
discovery. We strongly support the Commission's effort in this regard. MFA encourages the Commission to continue to monitor the appropriateness of the Federal speculative position limits and modify them in the future as warranted.

* * *

We appreciate this opportunity to comment on the Proposals, and would be pleased to meet with you to discuss our comments further. Please feel free to call me or Alicia Lewis at (202) 367-1140.

Sincerely,



John G. Gaine
President