

COMMENT

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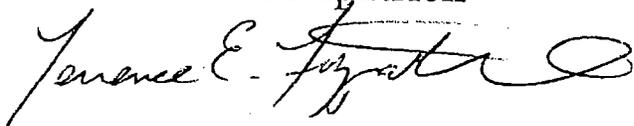
Subject: Proposed Rules for Trading Off the Centralized Market

Dear sir/madam,

I am happy to hear the CFTC is taking comment on this subject. I believe "block trading" is a non transparent method of trading that is disrupting the liquidity of our markets by removing trades from the centralized market. I have been told that it is possible the trades are part of a multi-leg trade that could not take place otherwise; I propose making that a requirement instead of a possibility. In addition I believe the current minimum requirements are so low, if it was the only position a trader put on in one market, it would barely be a "reportable" or a "large trader" position.

The CFTC should regulate these trades and implement stringent rules for trading off the centralized market.

Thank you,
Terrence E. Fitzpatrick



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