

From: Jim & Ruth Nieman <jandr@advantec.cc>
Sent: Tuesday, September 14, 2010 9:19 PM
To: Chilton, Bart <BChilton@CFTC.gov>
Cc: PosLimits <PosLimits@CFTC.gov>; O'Malia, Scott <SO'Malia@CFTC.gov>;
Sommers, Jill <JSommers@CFTC.gov>; Dunn, Michael <MDunn@CFTC.gov>;
Gensler, Gary <GGensler@CFTC.gov>
Subject: Fw: Position limits on all commodities:

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September 14, 2010

Dear Mr. Chilton:

I have learned that there are other commodities ranging upward to 2% of the world production as accountability limits. I, too discovered that there are many commission set federally mandated position limits some as low as 1/10 of 1% and many more less than 1%.

Why does copper have a current accountability level of 0.4, and the gold current accountability level of .75%? And why is silver's accountability 4.3% of world production?

If you are going to abide by the new law, why not bring those over 1% accountability, down to 1% and those under 1% up to the 1% level?

I understand silver should have an accountability of 1% which would mean 1400 contracts, absolutely no more than 1500 contracts.

I cannot understand the reasoning behind such a variation in the percentages of each commodity. There has never been any logical explanation for not adopting such a level. Since the congress and the president has given you the mandate, isn't it time to institute a correction in all commodities of infinite supply in a matter that is fair, simple and economically sound? A formula based upon a straight one percent or less of world production would accomplish just that.

Thank You.

Yours truly,

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