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July 29, 2003

COMMENT

Jean A. Webb
Secretary, Commodity Trading Futures Commission
Three Lafayette Center
115 21st Street, N.W.
Washington, D.C. 20581

**Re: CME Live Cattle Amendments: Request of Extension of Comment Period
and Preliminary Comments**

Dear Secretary Webb,

On behalf of Flint Rock Feeders, LTD., we are commenting on the "Chicago Mercantile Exchange: Proposed Amendments to the Live Cattle Futures Contract Restricting Delivery to Cattle Born and Raised in the United States," 68 FR 135 (July 15, 2003)

At the outset, we would like to point out that the comment period of 15 days (from July 15-July 30) is an unacceptably short comment period. On behalf of producers and U.S. feedlots and importers, those impacted by this amendment, we would like to emphasize to you that this comment period is unmanageable. We respectfully request that you extend the comment period to a standard 60-day comment period.

Despite the short comment period, we are providing the following preliminary comments on the proposed amendment.

This amendment would result in a price depressing affect on Mexican cattle and appears to be an effort by the U.S. industry to gain a price advantage through a U.S. government action. The amendment goes beyond the step of requiring labeling to an outright prohibition in order to manipulate the market to obtain a competitive advantage. The amendment would impede the movement of Mexican cattle and have a price depressing affect not only on Mexican cattle sold in the United States, but also on the Mexican domestic cattle market. This policy would work against integration of North American market and is counter to other U.S.-Mexico efforts.

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This amendment would prohibit non-U.S. cattle to be delivered on future contracts even if labeled according to the COOL regulation, making the amendment clearly inconsistent and the national treatment provisions of the WTO and the NAFTA. We respectfully submit that an outright requirement that "all cattle delivered on the futures contract must be born and raised exclusively in the United States..." violates the WTO and NAFTA, and we will be raising this issue with the Mexican Government.

This amendment would have serious negative economic consequences on the North American cattle market, and we believe that the policy change is ill-advised.

Sincerely,

A handwritten signature in cursive script, appearing to read "J.W. Whitaker".

J.W. Whitaker
General Partner