

LEHMAN BROTHERS

COMMENT

RONALD H. FILLER
SENIOR VICE PRESIDENT

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COMMODITY FUTURES TRADING COMMISSION
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March 9, 1998

Ms. Jean A. Webb
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Reproposed Amendments to CFTC Regulation 1.35 Relating to
Account Identification for Eligible Bunched Orders

Dear Ms. Webb:

Lehman Brothers Inc., a Futures Commission Merchant and a clearing member firm of all the major U.S. and non-U.S. commodity exchanges, welcomes the opportunity to submit comments in response to a release issued by the Commission which requested comments on the repropoed amendments to CFTC Regulation 1.35 relating to account identification for eligible bunched orders. We strongly support the Commission for taking the initiative to propose these and other proposed rule amendments that will permit more effective use of the futures markets by sophisticated institutional clients while, at the same time, preserving and maintaining effective customer protections for this special class of futures participants.

Senior representatives in the Futures Division at Lehman Brothers actively participated on various industry and self-regulatory committees which have reviewed these repropoed amendments to CFTC Regulation 1.35, in particular the subcommittee of the NFA's Special Committee on Multi-Tiered Regulatory Approach and thus are very familiar with the NFA comment letter submitted to the Commission. Lehman Brothers fully supports the views expressed in the NFA's comment letter and respectfully requests that the proposed changes set forth in the NFA comment letter be adopted by the Commission.

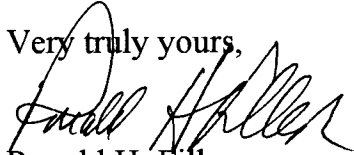
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The amendments recommended by the NFA, we believe, will provide significant customer protections and disclosures in this area while, at the same time, allowing additional eligible account managers and clients to take advantage of this important new exemptive relief from CFTC Regulation 1.35.

We further welcome the opportunity to meet with the Commission to explain our views in more detail.

Very truly yours,



Ronald H. Filler

cc: Geoffrey Aronow, Division of Trading and Markets
Alan Seifert, Division of Trading and Markets
Duane Andresen, Division of Trading and Markets