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COMMENT

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C.F.T.C.

Brian J. Baker
Serrino Trading Co, Inc.
141 W. Jackson, Suite 1910 A
Chicago, IL 60604
(312) 341-7649

1999 JUL 29 A 9:00

Acting Chairman David D. Spears
Commodity Futures Trading Commission
Headquarters Office
Three Lafayette Centre
155 21st St., NW
Washington, DC 20581

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July 26, 1999

Dear Mr. Spears,

As a commodity trading firm based in Chicago, IL, we feel we are being unfairly disadvantaged by the reluctance of the CFTC to permit installation and use of new Eurex terminals within the United States.

Serrino Trading Co., Inc. has spent over \$100,000 and dedicated hundreds of man-hours in attempting to obtain a Eurex terminal for our office in Chicago during the past year. New terminal applications were halted in 1998, but despite the fact that the moratorium was lifted in mid-June of this year, the CFTC has yet to allow Eurex to install new terminals. This creates a competitive disadvantage to U.S. firms and their clients, who cannot obtain the best possible execution of orders.

We feel the CFTC should immediately grant permission to Eurex to begin installation of new terminals.

Thank you for your consideration of this matter.

Sincerely,



Brian J. Baker

Cc: Commissioner Barbara Pedersen Holum
Commissioner James E. Newsome
Commissioner Thomas J. Erickson