

Dear Secretary Webb,

I am a U.S. cattle producer who opposes the CME's proposal to increase the maximum daily price limit of the live cattle futures market to \$3 per hundredweight.

I instead support the recommendations of the National Cattlemen's Beef Association that would increase the daily price limit from \$1.50 per hundredweight to \$2 per hundredweight with the ability for the CME to expand the daily limit to \$3 if the market closes at the limit two consecutive days. NCBA's proposal would allow the weekly market to move \$13 which is \$2 less than the potential \$15 per week move suggested by the CME. The limit of \$2 on a daily basis should allow the market to trade more effectively than the current \$1.50 limit which has led to an increasing number of days where the market is locked at the limit.

The NCBA proposal strikes a good compromise between the existing limit and the CME proposal.

NCBA engaged thoroughly in an open fashion with CME representatives at NCBA's annual business meeting in Phoenix last month. After hearing all of CME's arguments in favor of expanding the limit to \$3 per hundredweight, NCBA members discussed the pertinent issue of having a \$3 daily move. In the end it was decided by a majority vote of NCBA members to reject CME's proposal and instead focus on the merits of implementing a \$2 daily increase with allowances for expanding to \$3 should the market close at the limit on two consecutive days.

I support the National Cattleman's position on the CME futures price limits. NCBA proposed an increase in the daily price limits from \$1.50 to \$2.00 This should be a good compromise with the CME. If the trading limits are increased more than this, it could cause increased margin requirements with lenders who finance cattle operations because of increased volatility. The margin required by the CME would likely increase also because of the increased volatility created by the expanded trading limits.

Warmest regards,

Jerry Bohn
P.O. Box 945
Pratt KS 67124