

**E XCEL**

December 15, 2003

Ms. Jean A. Webb Office of the Secretariat Commodity Futures Trading Commission  
Three Lafayette Centre

1155 21<sup>ST</sup> Street, NW Washington, DC 20581



Re: Section 5c(c)(2) and Regulation Section 40.5 Submission. Request for Commission Rule Approval of Revisions to Daily Price Limits for Live Cattle Futures and Feeder Cattle Futures. Amendments to CME Rules 10102.1). and 10202.1). CME Submission #03-101.



Dear Ms. Webb:

C Excel Corporation is a major user of the CME Live Cattle futures market as a tool to hedge the risk associated in our business. We are strongly opposed to the proposed change to trading limits in the live cattle and feeder cattle contracts. It is our belief th trading limits are intended to keep an emotional event from moving the market within a short period of time to the detriment of the underlying physical cash commodity. The current limit of \$1.50/cwt allows for the cash market to move \$7.50/cwt per week. This range has only been exceeded one time in the history of the contract! While the market has had unprecedented volatility over the last several months it is highly improbable that the current volatility will not continue and more likely that the market will return to more normalized levels of volatility and price movement.



Please don't hesitate to give us a call to discuss further. Thank you for the opportunity to comment.

Sincerely,



Ken Bull

Excel Corporation Vice President

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**A CARGILL** FOODS company