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**From:** Lelliott, Jeff [Jeff.Lelliott@admis.com]  
**Sent:** Monday, January 07, 2008 12:52 PM  
**To:** secretary  
**Subject:** ICE Clear Section 4(c)

**COMMENT**

On the ICE proposal to clear OTC swap transactions.

My personal views are as follows

1. There is no mention of the OTC swap being subject to speculative limits. This may have an impact on spot month activity especially near or during spot months.
2. These transactions are for a few large investment houses and hedge funds and these transactions may have a detrimental impact or distortion on normal futures market price discovery.
3. These markets are generally small and these large transactions may remove liquidity and transparency from them. One can see the impact of these transactions in the oil markets and unfettered these transactions could have influence pricing towards them
4. The normal trade participants of these markets I would have thought to be significantly less capitalized than those of Energy and metal markets and most certainly smaller than the investment houses and funds. The trade should not be put at a disadvantage to the investment community when they are transacting their normal course of business, hedging.

I would also like to point out that as a member of an ICE trade committee there was no comment sought by ICE on this subject prior to submission.

Jeff Lelliott

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