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447
Gateway Blvd., Suite 101
Fresno, CA 93727
Telephone: 559 / 252-0684
Fax: 559 / 252-0551

April 10, 2001

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

Reference: Proposed Amendments to NYCE #2 Futures Contract Regarding Micronaire

Dear Ms. Webb,

On behalf of the California Cotton Growers Association whose membership today represents 99.9% of the total cotton produced in California and the California Cotton Ginners Association whose membership today represents 100% of all ginning operations in California, I would like to register our firm opposition to the proposed changes in the micronaire discount ranges in the current NYCE #2 future contract.

To change the discount range from its current 5.0 and above to include 4.8 and 4.9 levels would be disruptive and in direct conflict with current government loan discount levels as well as customary cotton trade contracts.

History tells us that as a whole, micronaire readings in these ranges have not been a large percentage of the overall crop. History also tells us that there is not a trend in this area that indicates any consistent upward movement although it can be concluded that years do vary in the percentage of micronaire readings in these ranges. Whether these variances are caused by climatic conditions, varietal choices, or other causes are certainly of concern and research efforts are currently underway in the cotton industry to find answers to the causes of variances in micronaire readings from year to year.

For the CFTC to make such a change at this time is not warranted based upon the low percentage of cotton with these micronaire levels as compared to the total market volume and such a change would cause the NYCE #2 future contract not to be representative of the majority of cotton traded in the marketplace.

Finally, I submit to you that this proposed change will unjustly penalize the cotton producer and fall outside the CFTC's founding principles of protecting, in my opinion, the most important and vital segment of the industry and that is the producer.

Thank you for your consideration of these comments.

Sincerely,

Earl P. Williams
President/CEO