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April 18, 2001

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

Re: Proposed Amendments to the New York Cotton Exchange #2 Futures Contract Concerning Micronaire, Strength and Old Crop Cotton

Dear Ms. Webb:

Southwestern Irrigated Cotton Growers Association (SWIG) is for marketing the cotton crops produced by approximately 1,100 grower/members in New Mexico, Far West Texas and Eastern Arizona. On behalf of these cotton producers, SWIG would like to voice support for the amendment portions relating to old crop cotton and fiber strength. However, SWIG opposes changes that would create a discount for 4.8 and 4.9 micronaire cotton.

In today's world, spinning mills arrange their cotton consumption based on average micronaire levels, and shippers are able to meet the needs of mills by shipping cotton in the 4.8 and 4.9 micronaire range with other bales to achieve desirable averages. Given this practice in our industry, discounts for 4.8 and 4.9 micronaire are unwarranted.

SWIG has observed that more often than not, cotton growers are unfairly impacted by modifications in quality premium and discount levels. SWIG fears that futures contract discounts for 4.8 and 4.9 micronaire cotton will at some point become a discount component in contracts entered into with cotton growers, even when actual market conditions do not signal discounts for this quality range.

SWIG feels the change in micronaire discounts is an overreaction given the relatively small percentage of U.S. cotton that falls into the 4.8 to 4.9 micronaire range. Furthermore, cotton producers in conjunction with cotton breeders and other researchers are working aggressively to improve micronaire characteristics in cotton. SWIG feels that any perceived quality issue can and will be resolved through such research without the imposition of an additional penalty in the futures contract.

Yours truly,

David L. Hand
President

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