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COMMENT

Jean Webb
Secretary
Commodity Futures Trading Commission
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Request for Extension of Comment Period for Notice of Proposed Rulemaking on an Exclusion for Certain Otherwise Regulated Persons From the Definition of the Term "Commodity Pool Operator," 67 Fed. Reg. 65743 (Oct. 28, 2003).

Dear Ms. Webb:

We are in the process of preparing comments on behalf of the General Motors Investment Management Corporation on both the above Notice of Proposed Rulemaking ("Rule 4.5 Proposal") and the Advanced Notice of Proposed Rulemaking regarding "Commodity Pool Operators and Commodity Trading Advisors; Exemption From Requirement To Register for CPOs of Certain Pools and CTAs Advising Such Pools (67 Fed. Reg. 68785 (Nov. 13, 2003)) ("NFA/MFA Proposal"). Comments on the Rule 4.5 proposal are due on December 12, 2002 and comments on the NFA/MFA Proposal are due on January 13, 2003.

In preparing our comments, we have been struck by the substantial overlap of many of the issues raised in the two Federal Register notices, particularly in the context of the notional amount tests and the rationale for excusing parties from registering as CPOs and CTAs. Accordingly, we are requesting that the Commission grant an extension of time to file comments on the Rule 4.5 Proposal to make those comments due at the same time as the NFA/MFA proposal. That schedule would facilitate a comprehensive treatment of the related issues raised without requiring the Commission to delay action in any way on either proposal.

Thank you for your consideration.

Sincerely,


Maureen A. Donley-Hoopes

MADH/pan

cc: Barbara Gold, CFTC
Scott Parsons, CFTC
Jane Kang Thorpe, CFTC

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