

COMMENT

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250 PARK AVENUE
 NEW YORK, NEW YORK 10177
 TELEPHONE: (212) 415-9200
 FAX: (212) 953-7201
 www.dorseylaw.com

Michael F. Griffin
 (212) 415-9222
 griffin.michael@dorseylaw.com

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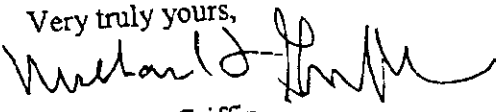
Ms. Jean A. Webb
 Secretary of the Commission
 Commodity Futures Trading Commission
 Three Lafayette Centre
 1155 21st Street, NW
 Washington, DC 20581

Re: Additional Registration and Other Regulatory Relief for Commodity Pool
 Operators and Commodity Trading Advisors
 (68 FR 12622, March 17, 2003)

Dear Ms. Webb:

Dorsey & Whitney LLP is pleased to provide comments to the Commission on the above-referenced proposed CFTC regulations on registration and other regulatory relief for commodity pool operators (CPOs) and commodity trading advisors (CTAs), and the accompanying release cited above (individually or collectively, the "Proposed Rules"). This letter urges the CFTC to adopt these Proposed Rules as final rules; in particular, we strongly support the MFA Proposal (Proposed Rule 4.13(a)(4)). We believe the MFA Proposal will encourage more participation in commodity futures trading by pool operators that had previously declined to engage in this market and should be adopted in its proposed form.

We thank the Commission for its efforts on this important issue.

Very truly yours,

 Michael F. Griffin

MFG:csp

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