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Kellee J. Fisher
700 York Road
Glenview, IL 60025

April 20, 1998

COMMENT

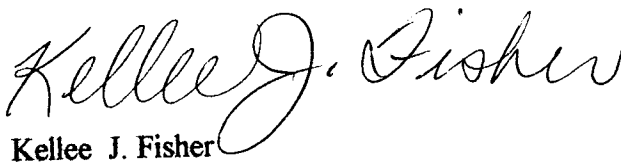
Brooksley Born, Chairperson
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

RE: CFFE Proposal

Dear Ms. Born:

I wish to strongly oppose the registration of the CFFE as a contract market. Under the CFTC's rules concerning trading standards, it appears that the CFFE's imitation of certain cash trading conventions will be a violation. The CFFE's non-prohibition of disclosure of customer orders, inequitably allocating customer orders, and accommodation trading also appear to violate the fair and competitive trading standards of the Commodity Exchange Act. It is the CFTC's responsibility to ensure that customers are able to receive fair treatment, including on this proposed new exchange.

Sincerely,


Kellee J. Fisher