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TRADING COMMISSION  
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August 31, 1998

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

## COMMENT

Attention: Ms. Jean A. Webb  
Secretary of the Commission

**Subject: Concept Release on the Placement of Foreign Bord of Trade's Computer  
Terminals in the United States**

Dear Ms. Webb:

We have read with interest the above mentioned Concept Release and wish to make the following comments:

- We believe that, at the pace trading in futures is evolving currently, it will be necessary for regulators to adopt rules quickly concerning the placement of foreign terminals in the U.S.
- Any prolongation of the comment period or delay in the completion of the process would put other exchanges, which are considering the placing of terminals in the U.S., at a disadvantage vis-à-vis those that have already received a Commission approval.
- In that connection, exchanges should be allowed to initiate their petition process when the actual rule making process starts rather than after it ends.
- The Commission could also consider the possibility of temporary relief for exchanges which agree to conform with the most stringent of the CFTC's proposed rules. These could be relaxed later if such rules are not adopted as such.
- Exchanges which already enjoy Part 30.10 clearance should presumably bear a lesser burden. In particular, one could consider the elimination of the regulatory comparability requirement for such exchanges.

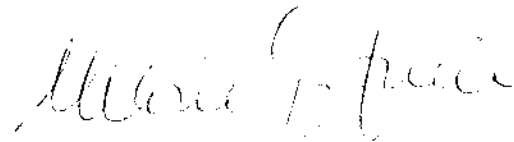
Tour de la Bourse

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- Finally, we would suggest avoiding duplicative examination of similar trading systems. This issue is particularly of interest to us, in view of the fact that we have now signed an agreement with Société des Bourses de France to use their platform for night-time trading of our financial futures contracts. This platform is similar to the one used currently by Globex.
- With respect to the issue of terminals that permit order routing, we would suggest that regulation of same should be limited to ensuring that orders which are routed to a system will not cause chaos. In that context, it should be remembered that members remain responsible for client orders and that therefore any regulation of order routing is really regulation of the FCMs rather than the exchanges. In that sense, credit and position limit checks should be required to the extent that they already are required for FCMs dealing with clients, in a non-electronic environment. In other words, the computer should be required to do what the human being is required to do.

Yours truly,



Marie Giguère  
Executive Vice-President  
Corporate Affairs and General Secretary