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OFFICE OF THE SECRETARIAT

COMMENT

November 19, 1999

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

**BY FIRST CLASS MAIL
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Dear Ms. Webb:

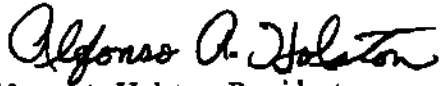
Federal Register release number 99-035 and Federal Register release number 99-036 ("the releases"), which the Commodity Futures Trading Commission ("CFTC") published in the Federal Register on September 30, 1999, provide for comments to be submitted in response to the releases. For purposes of commenting on the releases, I submit this letter in my official capacity as the President of American Federation of Government Employees Local 3827 ("the union"). The union is the exclusive representative of all employees in the bargaining unit consisting of professional employees working in CFTC's Eastern Regional Office in New York City.

REQUEST FOR EXTENSION OF TIME TO COMMENT

On November 9, 1999, the Equal Employment Opportunity Commission issued a final rule ("final rule") which was published on CFTC's INTRANET site. Issuance of the final rule falls during the extension of the time period provided for the union to submit comments on the releases. Having read the final rule, I find that I must ask for further additional time in order to seek additional counsel about the meaning and significance of the releases in light of the final rule. The final rule is a very substantial document which may impact upon the releases, and vice versa. An additional extension of time is appropriate for the bargaining unit to inform itself properly, and to provide responsive comment. If an additional extension of time cannot be granted without publishing notice in the Federal Register, then I request that a suitable notice be published in the Federal Register, thereby permitting all CFTC's employees to comment on how they see that the releases and the final rule may intersect.

Thank you for your attention to these matters. I appreciate your response.

Very truly yours,

A handwritten signature in cursive script that reads "Alfonso A. Holston".

Alfonso A. Holston, President
American Federation of Government Employees--
Local 3827