

Dear CFTC:

Eurex has stated it will charge professional traders .20 per side for trading fees.

November 24th the CBT launches Fed Fund electronic trading on the LIFFE Platform and the CBT charges professional traders \$1.25 per side, because there is no competition for this contract.

The Eurex will really bring transparency competition and efficiency when they bring electronic trading to the CME when they replicate the Chicago Merc's Euro\$ contract , which is about 5% electronic and where fees per side for professional traders cost \$2.00. The CME has stated they are cutting per side Euro\$ fees "for Foreign trading groups to .44c per side, but not providing US traders the same break?

The largest futures and options contract , Euro\$ with 5,000,000 open interest trades 5% electronic because there is no competition. Euro\$ Options have 10,000,000 open interest and are 0% electronic because there is no competition.

When Eurex offers both CBT and CME rate products then there will be a level playing field.

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