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DB Commodity Services LLC

Deutsche Bank  
Group



DB Commodity Services LLC  
60 Wall Street  
5th Floor  
New York, NY 10005

December 14, 2007

David Stawick  
Secretary  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

COMMENT

OFFICE OF THE SECRETARIAT

2007 DEC 14 PM 3:07

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**Re: Revision of Federal Speculative Position Limits**  
**Comment File 07-014**

Dear Mr. Stawick:

Thank you for the opportunity to comment on the above-referenced proposal. We support the Commission's proposal to increase single-month and all-month position limits in Rule 150.2, but we express no view on the Commission's proposal to aggregate certain positions.

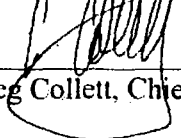
Although we think that financial innovations like over-the-counter derivatives and exchange-traded notes linked to commodity futures argue for further loosening position limits and related rules, we agree with the Commission's proposal to raise the limits contained in Rule 150.2. We further agree that, if the current framework for determining the proper size of position limits under Rule 150.2 is maintained, the Commission should review the limits periodically and increase them based on increased open interest.

Thank you again for giving us the opportunity to comment on the above-referenced proposal and the position limits regulatory framework generally.

Respectfully submitted,

DB Commodity Services LLC

By:   
Kevin Rich, Chief Executive Officer

By:   
Greg Collett, Chief Operating Officer