

**From:** Susan Hathaway <susanhathaway@earthlink.net>  
**Sent:** Thursday, December 2, 2010 8:50 AM  
**To:** dfdefinitions <dfdefinitions@CFTC.gov>  
**Subject:** Re: No loopholes in Dodd-Frank

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1) Securities and Exchange Commission/Commodities Futures Trading Commission, Re: Commercial Risk (CFTC RIN 3235-AK65, SEC File Number S7-12-10)

Dear Commissioners Shapiro and Gensler:

It's long past time for you to side with Main Street against Wall Street, instead of the other way around, as has become the norm.

Don't let the American Bankers Association (ABA) redefine important terms like "commercial risk" to keep banks that engage in risky derivatives trading from complying with transparency and business conduct requirements. Commercial risk should NOT be expanded to include financial risk. Accepting the ABA argument would open the door for exemptions for risky hedge funds and insurance companies.

2) Commodities Futures Trading Commission, Re: Position Limits (RIN 3038-AD17 )

Dear Commissioner Gensler:

The CFTC needs to set strong position limits to crack down on the energy and food commodity speculation that serves no productive purpose. I urge the Commission to define limits that will address not only manipulation, but also excessive speculation, which will require a stricter approach.

3) U.S. Department of the Treasury, Re: FX Swaps (75 FR 66426 Document Number 2010-27274)

Dear Secretary Geithner:

Just say "no" to foreign exchange traders who want to exempt foreign currency derivatives from the clearing and transparency requirements of the already

partially eviscerated Dodd-Frank Act. \$4 trillion dollars a day is traded in these highly-leveraged swaps, and this number will increase to more than \$10 trillion in a decade, as long as you keep giving the banksters every single thing they want and telling them it's perfectly all right to take it from those of us who have nothing. As the head of the Financial Stability Oversight Board,

however oxymoronic a title that may be, your job is to decrease risk in the system, not encourage off-book trading and opaque markets. But you know that, and obviously you don't care.

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