



November 15, 2010

Scott D. O'Malia  
Commissioner  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, D.C. 20581

RE: Section 724 (Segregation and Bankruptcy) of the Wall Street Reform and Consumer Protection Act (the "Act")

Dear Mr. O'Malia,

I am writing in response to your request for comments related to the segregation of client funds for cleared swaps. We appreciate your request for our input.

The National Sorghum Producers is an agriculture commodity organization that represents sorghum producers from coast to coast in regulatory and legislative representation and through education.

Because we are not traded on exchanges, many of the issues at hand are not applicable to our commodity at this time. However, we do believe it is important to express our support for the omnibus account option, where any loss due to a single customer is mutualized by the futures commission merchant.

Additionally, we believe that increasing the margin requirement for members would be a detriment to entering the market. We do not support a change in rules that would cause exchanges to raise margin requirements.

Again, thank you for requesting our input on this important issue. Please do not hesitate to contact the National Sorghum Producers at (806) 749-3478 with any further questions.

Sincerely,

A handwritten signature in black ink that reads "Gerald Simonsen". There is a long horizontal line above the signature that starts under the 'G' and extends to the right, ending under the 'n'.

Gerald Simonsen  
Chairman  
National Sorghum Producers