



**KANSAS CITY  
BOARD OF TRADE**  

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**CLEARING CORPORATION**

May 4, 2012

Mr. Ananda Radhakrishnan  
Director  
Division of Clearing and Risk  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, N.W.  
Washington, DC 20581

Re: Extension Request

Dear Mr. Radhakrishnan:

Recently a number of substantial concerns have been brought to our attention regarding the impact of CFTC Regulation 39.13(g)(8)(ii) as it applies to customers that are exchange members (member-customers) and to customer omnibus accounts. The Kansas City Board of Trade Clearing Corporation hereby requests an extension of 90 calendar days from May 7, 2012 to comply with the requirements of Regulation 39.13(g)(8)(ii) in order for KCBTCC to fully address these concerns. During this extended time period, KCBTCC will keep members informed and will provide adequate advance notice of any changes to margin requirements.

Thank you for your consideration of our extension request.

Sincerely,

Charles Savage  
Assistant Vice President & Manager