



Via Electronic Mail

May 4, 2012

Mr. Ananda Radhakrishnan
Director of Division of Clearing and Risk
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581

SUBJECT: Extension Request

Dear Mr. Radhakrishnan:

The Minneapolis Grain Exchange, Inc. ("MGEX" or "Exchange") hereby respectfully requests an extension of ninety (90) days to comply with the requirements of final Commodity Futures Trading Commission ("CFTC" or "Commission") regulation §39.13(g)(8)(ii)¹ that, absent the extension, is to be effective as of May 7, 2012 as it applies to customers that are exchange members (member-customers) and omnibus accounts. If extension is not granted, there will be significant impact on Exchange markets, market participants and MGEX internal compliance. The Exchange is currently working with and will continue to work with the CFTC and industry members to address the compliance issues.

If there are any questions regarding this request, please contact me at (612) 321-7128. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric J. Delain".

Eric J. Delain
Corporate Counsel

cc: Phyllis Dietz
Heidi Rauh
Steve Greska

¹ 76 FR 69334, 69439 (Nov. 8, 2011).