NATIONAL CORN GROWERS ASSOCIATION

May 16, 2012

The Honorable Gary Gensler
Chairman, Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street, NW
Washington, DC 20581

Dear Chairman Gensler:

Founded in 1957, the National Corn Growers Association (NCGA) represents approximately 37,000 dues-paying corn growers and the interests of more than 300,000 farmers who contribute through corn checkoff programs in their states. NCGA and its 48 affiliated state associations and checkoff organizations work together to help protect and advance corn growers' interests. We request that the Commodity Futures Trading Commission (CFTC) institute a 30-day public comment period to take input and further analyze plans by both The Intercontinental Exchange (ICE) and the CME Group to commence 22-hour per day electronic trading of grain and oilseed futures contracts.

As currently formulated, both ICE's plans for new contracts with greatly expanded trading hours and the CME Group's plans to expand hours raise serious issues that potentially place the Nation's corn growers at a marketing disadvantage.

First, allowing the futures markets to trade during the release of key U.S. Department of Agriculture (USDA) reports can lead to rampant market distortions. Growers utilize USDA crop production reports, crop progress and grain stocks reports, planted acreage reports, World Agricultural Supply and Demand Estimates and others to adjust their risk management strategies and futures positions. Trading through release of these reports could lead to extreme volatility immediately following their release. There is currently unequal access to USDA report data due to Internet connection speeds and analysis capabilities. Additionally, the need for every market participant to have the same report at the same time could lead to overloading USDA's ability to electronically deliver this information. We believe it is prudent that these reports be released while futures markets are closed so that all market participants have the opportunity to access and analyze information and adjust their positions before trading resumes.

Second, growers routinely track futures and cash markets throughout the day, and make marketing decisions based on market movements. It is impossible for growers, and many of the small elevators we rely upon, to actively track markets through later afternoons and evening trading sessions, let alone 22 hours per day. These expanded hours will put us at a competitive disadvantage to large traders who can staff around the clock.

Approval of these major market changes without a 30-day comment period is ill-timed since many growers are currently preoccupied with planting. We believe that there is no compelling reason why 22-hour trading needs to begin imminently. It is much preferable that expanded hours and new contracts be analyzed in a deliberate fashion for effects on cash and futures markets, volatility and producer-customer relationships than to rush to implementation unnecessarily. We believe strongly that ICE and CME both should be subject to the same comment period or delay in implementation in order to avoid disadvantaging either organization. We would be very happy to discuss the above issues and answer any questions.

Sincerely,

Garry Niemeyer

Garry Niemeyer
President
Auburn, Illinois