

October 6 , 2008

David A. Stawick, Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street N.W.
Washington, D.C. 20581

RE: Implementation of Changes to CBT Wheat Futures Contract

Dear Mr. Stawick:

I am providing comment on the Commodity Futures Trading Commission's Release 5541-08 dated September 9, 2008 regarding the Chicago Board of Trade's request from the Commission to implement rule changes to the CBT wheat futures contract. See a copy of the release below this letter.

I understand that the CBT has recommended three new delivery territories, one that includes elevators located on the Mississippi River between St. Louis and Memphis at a \$.20 per bushel premium. As a large wheat producer from Arkansas whose wheat is tributary to grain elevators on the Mississippi River south of Memphis, I believe I am entitled to the same opportunity to sell my wheat for a competitive price that isn't substantially below the price that wheat producers receive for their wheat just north of me.

For this reason, I would like to see the CBT's recommendation to add barge loading facilities on the Mississippi River from below St. Louis to Memphis expanded to include Mississippi River barge loading facilities below Memphis to Greenville, MS, rather than ending the delivery territory arbitrarily and, in my opinion, unfairly at Memphis.

Sincerely,

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