

KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

655 Fifteenth Street, N.W.
Washington, D.C. 20005

Mark D. Young
To Call Writer Directly:
(202) 879-5084
myoung@kirkland.com

(202) 879-5000

www.kirkland.com

Facsimile:
(202) 879-5200

October 6, 2008

VIA ELECTRONIC MAIL: mmr@ftc.gov

Federal Trade Commission
Office of the Secretary - Room H-135
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Market Manipulation Rulemaking Workshop--Request to Participate,
PO82900

Dear Sir/Madam:

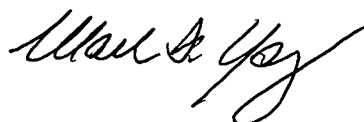
I am writing to request the opportunity to participate as a panelist in the Federal Trade Commission's workshop to be held on November 6, 2008 in connection with the ongoing petroleum market manipulation rulemaking. I am representing a group of interested parties in connection with this rulemaking, which includes the Futures Industry Association, Managed Funds Association, CME Group, Inc., National Futures Association and Intercontinental Exchange, Inc. This group will be filing a comment letter on the Commission's proposed rule on or before October 17.

The group's comment letter will address the exclusive jurisdiction of the Commodity Futures Trading Commission (CFTC) under the Commodity Exchange Act (CEA), the inclusion of ethanol and agricultural commodities within the proposal's definition of gasoline, and the legal conflicts that would arise if the FTC's rule and the CEA's price manipulation and anti-fraud standards are both made applicable to futures trading in the U.S..

As a former Associate General Counsel for the CFTC, I have practiced in the area of derivatives and CEA jurisprudence for over thirty years. I also teach a seminar in Derivatives Regulation in the LLM program at the Georgetown University Law Center.

Thank you for considering my request to participate

Sincerely,



Mark D. Young