

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 the Chicago Mercantile Exchange Inc. (CME Group). CME Group is the parent company of CME Inc, The Board of Trade of the City of Chicago Inc., the New York Mercantile Exchange (NYMEX) – the world's largest forum for trading and clearing physical-based energy futures contracts, and COMEX. The CME Group Exchanges offers a comprehensive selection of benchmark products in all major asset classes, including futures and options based on interest rates, equity indexes, foreign exchange, agricultural commodities, energy, and metals, as well as alternative investment products such as weather and real estate. CME Group will join with other interested parties including the Futures Industry Association, Managed Funds Association, National Futures Association and Intercontinental Exchange, Inc. in filing a comment letter in connection with the above referenced rulemaking.

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 Counsel to two Chairmen at the CFTC, Special Counsel in the CFTC's Division of Trading and Markets (now the Division of Market Oversight), Senior Vice President and Chief Legislative Counsel at NYMEX and, currently Managing Director, Government Relations for the CME Group, I have over 25 years of futures regulatory and market experience.

Thank you for considering my request to participate.

Sincerely,

De'Ana H. Dow