

Dear Sirs:

I must strongly oppose any premature approval of Eurex in the USA. The CFTC has spent its entire career trying to protect the customer from abuse, while Eurex is set up specifically to allow both off-market trading and fading of customer orders by their own firms. This is extremely likely to produce scandals akin to the mutual fund debacles currently being faced by the SEC. Customer protection must remain paramount.

In addition, the continued disingenuousness of Eurex on such issues as real control, their payment for order flow plans, and response to American regulators must be addressed before approval is given.

Thank you for your consideration.

Sincerely,

David J. Fisher  
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