

MEMO# 27719

November 25, 2013

Member Call to Discuss Potential Comments on CFTC's Re-Proposed Position Limits and Aggregation Proposal on Tuesday, December 3 at 3:00 p.m. ET

[27719]

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TO: CLOSED-END INVESTMENT COMPANY COMMITTEE No. 31-13
DERIVATIVES MARKETS ADVISORY COMMITTEE No. 83-13
SEC RULES COMMITTEE No. 46-13 RE: MEMBER CALL TO DISCUSS POTENTIAL COMMENTS ON CFTC'S RE-PROPOSED POSITION LIMITS AND AGGREGATION PROPOSAL ON TUESDAY, DECEMBER 3 AT 3:00 P.M. ET

Recently, the Commodity Futures Trading Commission ("CFTC" or "Commission") proposed to amend regulations concerning speculative positions limits. [\[1\]](#) In a separate release, the CFTC also proposed modifications to the aggregation provisions. [\[2\]](#) ICI's Memorandum summarizing these proposals is available at http://www.ici.org/my_ici/memorandum/memo27707.

A member call to discuss potential ICI comments is scheduled for Tuesday, December 3, 2013 at 3:00 p.m. ET. If you plan to attend the conference call, please respond to Ruth Tadesse at rtadesse@ici.org or (202) 326-5836.

Jennifer S. Choi
Senior Associate Counsel Securities Regulation

endnotes

[\[1\]](#) Position Limits for Derivatives, available at <http://www.cftc.gov/ucm/groups/public/@newsroom/documents/file/federalregister110513c.pdf> ("Proposed Rules"). Comments are due 60 days after publication of the Proposed Rules in the Federal Register. The CFTC originally adopted position limits in November 2011,

which was challenged in court. In September 2012, the District Court for the District of Columbia vacated those rules. At the open meeting to vote on the Proposed Rules, the CFTC confirmed that it would voluntarily dismiss its appeal of the decision of the District Court.

[2] Aggregation of Positions, 78 FR 68946 (Nov. 15, 2013), available at <http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2013-27339a.pdf> ("Aggregation Proposal"). Comments on the Aggregation Proposal are due by January 14, 2013.

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