

MEMO# 29083

June 10, 2015

ICI Submits Letter of Support to House of Representatives for Commodity End User Relief Act

[29083]

June 10, 2015

TO: REGISTERED FUND CPO ADVISORY COMMITTEE
CLOSED-END INVESTMENT COMPANY MEMBERS No. 20-15
DERIVATIVES MARKETS ADVISORY COMMITTEE No. 44-15
SMALL FUNDS MEMBERS No. 27-15
SEC RULES MEMBERS No. 39-15 RE: ICI SUBMITS LETTER OF SUPPORT TO HOUSE OF REPRESENTATIVES FOR COMMODITY END USER RELIEF ACT

Paul Stevens, ICI's President and CEO, submitted the attached letter yesterday to the U.S. House of Representatives ("House") expressing support for H.R. 2289, the Commodity End-User Relief Act. H.R. 2289, which was approved by the House yesterday, includes provisions that would exclude from the definition of commodity pool operator and commodity trading advisor under the Commodity Exchange Act those investment advisers to registered funds that invest in commodity interests limited to "financial commodities," e.g., S&P 500 swaps and other securities-like derivatives, and do not invest in traditional commodities, such as natural resource and agricultural commodities.

The letter explains that H.R. 2289 contains important provisions that lower costs for fund investors without undermining investor protections. The letter emphasizes that duplicative registration requirements by the Commodity Futures Trading Commission ("CFTC") has resulted in increased costs for registered funds and their shareholders, and that H.R. 2289 would reduce duplicative and unnecessary regulation of registered funds without undermining the CFTC's existing authority over traditional commodity pools. [\[1\]](#)

Sarah A. Bessin
Associate General Counsel

[Attachment](#)

endnotes

[1] ICI's statement for the record on CFTC reauthorization is summarized in ICI memorandum No. 28856 (March 24, 2015), available at http://www.ici.org/my_ici/memorandum/memo28856.

Copyright © by the Investment Company Institute. All rights reserved. Information may be abridged and therefore incomplete. Communications from the Institute do not constitute, and should not be considered a substitute for, legal advice.