



August 26, 2016

**Via Website Submission**

Christopher Kirkpatrick  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**Re: RIN 3038-AE47; Commodity Pool Operator Annual Report**

Dear Mr. Kirkpatrick:

Managed Funds Association<sup>1</sup> (“**MFA**”) respectfully requests that the Commodity Futures Trading Commission (“**Commission**”) grant an extension to the 30-day public comment period on its notice of proposed rulemaking on amendments to certain regulations applicable to the Annual Report that each registered commodity pool operator (“**CPO**”) must distribute for each commodity pool that it operates (the “**Proposal**”).<sup>2</sup> MFA is drafting comments in response to the Commission’s request for comments on the Proposal. As an association representing the views of the alternative investment industry, MFA strives to provide comments representative of the views of its membership. MFA is finding it challenging to ensure that members have adequate time to review comments for submission by September 6, 2016, as many members have scheduled family vacations and/or are getting ready for back-to-school, and are out-of-the-office during the last two weeks of August.

Accordingly, MFA respectfully requests that the Commission consider granting a two-week extension to the Proposal comment period, extending the comment period from September

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<sup>1</sup>Managed Funds Association (MFA) represents the global alternative investment industry and its investors by advocating for sound industry practices and public policies that foster efficient, transparent, and fair capital markets. MFA, based in Washington, DC, is an advocacy, education, and communications organization established to enable hedge fund and managed futures firms in the alternative investment industry to participate in public policy discourse, share best practices and learn from peers, and communicate the industry’s contributions to the global economy. MFA members help pension plans, university endowments, charitable organizations, qualified individuals and other institutional investors to diversify their investments, manage risk, and generate attractive returns. MFA has cultivated a global membership and actively engages with regulators and policy makers in Asia, Europe, North and South America, and many other regions where MFA members are market participants.

<sup>2</sup> 81 Fed. Reg. 51828 (Aug. 5, 2016), available at: <http://www.cftc.gov/idc/groups/public/@lrfederalregister/documents/file/2016-18400a.pdf>.

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6 to September 20. We appreciate the Commission's consideration of our request and would be happy to discuss it with the Commission or its staff. Please feel free to contact Jennifer Han, Associate General Counsel, or the undersigned at (202) 730-2600.

Respectfully yours,

/s/ Stuart J. Kaswell

Stuart J. Kaswell  
Executive Vice President & Managing Director,  
General Counsel

CC: Eileen Flaherty, Director, Division of Swap Dealer and Intermediary Oversight  
Barbara Gold, Associate Director, Division of Swap Dealer and Intermediary Oversight