

May 31, 2018

The Honorable James Lankford  
Chairman  
Subcommittee on Financial Services  
and General Government  
Committee on Appropriations  
United States Senate  
Washington, DC 20510

The Honorable Christopher Coons  
Ranking Member  
Subcommittee on Financial Services  
and General Government  
Committee on Appropriations  
United States Senate  
Washington, DC 20510

Dear Chairman Lankford and Ranking Member Coons:

The signatories below represent a very broad and diverse cross-section of U.S. production agriculture and agribusiness. On behalf of our members nationwide, we respectfully request that the Administration's full budget request of \$281.5 million for the Commodity Futures Trading Commission (CFTC) be included in the FY19 Financial Services and General Government appropriations bill.

The CFTC performs the critically important role of helping to safeguard U.S. futures and swaps markets. The Commission's responsibilities have expanded dramatically in recent years, but funding has not kept up. For U.S. agricultural futures markets that are utilized extensively by our members to manage their market and business risks, this regulatory oversight is absolutely crucial.

In addition, several rulemakings and other initiatives underway or planned at CFTC have direct bearing on price discovery and risk management functions for U.S. agriculture:

- Position Limit Rule – As this very important rule moves toward final status, it is imperative that CFTC has sufficient staff and resources to get the rule right.
- Reg AT/High-Frequency Trading – Commission oversight continues to be needed to help ensure that high-frequency trading doesn't overwhelm or otherwise adversely impact our agricultural futures contracts.
- Block Trading – Now that block trading has been extended to agricultural contracts, close scrutiny is merited by the Commission to preserve appropriate liquidity and transparency for agricultural futures markets.
- Commitments of Traders Report – Enhancements to provide additional frequency and transparency are needed but will require personnel and technology resources.

Currently, the CFTC lacks the funding to hire important personnel. Without sufficient resources to staff the Commission and invest in needed technology upgrades, the CFTC's ability to perform these important functions, as well as to continue its core regulatory mission, will be undermined.

Thank you for your attention to this request. As representatives of America's farmers, ranchers and agribusinesses, we look forward to working with you to preserve and enhance the CFTC's effectiveness for U.S. agriculture.

Sincerely,

American Bakers Association  
American Cotton Shippers Association  
American Farm Bureau Federation  
American Feed Industry Association  
American Soybean Association  
Commodity Markets Council

National Association of Wheat Growers  
National Cattlemen's Beef Association  
National Corn Growers Association  
National Cotton Council  
National Council of Farmer Cooperatives  
National Grain and Feed Association  
National Pork Producers Council  
North American Export Grain Association  
North American Millers' Association  
USA Rice

cc: The Honorable Richard Shelby  
The Honorable Patrick Leahy