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National Futures Association

200 West Madison Street Chicago, Illinois 60606

312 726-0070

September 14, 1982

Ms. Jane K. Stuckey Office of the Secretariat Commodity Futures Trading Commission 2033 K Street, N.W. Washington, D. C. 20581

RE: National Futures Association Proposed Amendments to Compliance Rules

Dear Ms. Stuckey:

Pursuant to Section 17(j) of the Commodity Exchange Act, National Futures Association ("NFA") hereby files with the Commission and requests Commission approval of the following addition to NFA Compliance Rules:

> Rule 2-13. CPO/CTA REGULATIONS Any Member who violates any of CFTC Regulations 4.16 through 4.41 shall be deemed to have violated an NFA requirement.

Current Compliance Rule 2-11, which was redesignated Rule 2-13 in NFA's submission under Section 17(j) dated August 27, 1982, would be redesignated Rule 2-14. Proposed Rule 2-13 has been submitted to NFA's Board of Directors. NFA will notify the Commission by supplemental letter of the date of its adoption by the Board.

The purpose of the addition of this Rule is to provide a basis in NFA Rules for the eventual implementation of a complete NFA regulatory program with respect to pool operators and trading advisors. Although initial implementation of NFA Compliance Rules with respect to commodity pool operators and commodity trading advisors has been scheduled by NFA's Board of Directors for January 15, 1983, it is NFA's intention to comply with requests of the Commission during the interim period to conduct special audits of particular NFA members which are commodity pool operators or commodity trading advisors. Ms. Jane K. Stuckey September 14, 1982 Page 2.

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NFA respectfully requests that the foregoing amendment to NFA Compliance Rules be declared effective upon approval by the Commission.

> Very truly yours, NATIONAL FUTURES ASSOCIATION

mould by

Robert K. Wilmouth President and Chief Executive Officer

JHH:usw

cc: Theodore W. Urban

UNITED STATES OF AMERICA COMMODITY FUTURES TRADING COMMISSION

OCT 0 1 1982

2033 K Street, N.W. Washington, D.C. 20581



September 29, 1982

Mr. Robert K. Wilmouth President and Chief Executive Officer National Futures Association 200 West Madison Street Chicago, Illinois 60606

Re: Proposed National Futures Association Compliance Rule 2-13

Dear Mr. Wilmouth:

By letter dated September 14, 1982, the National Futures Association (NFA) submitted the above proposed rule for Commission approval pursuant to section 17(j) of the Commodity Exchange Act. This is to inform you that the Commission approved, pursuant to section 17(j) of the Act, proposed Compliance Rule 2-13 (and the renumbering of Rule 2-13 to 2-14) on September 29, 1982. The Commission has also determined pursuant to section 17(j), that this rule may go into effect immediately, rather than thirty days from the date of Commission approval.

Very truly yours,

Huckey

Jane K. Stuckey Secretary of the Commission

200 W. MADISON ST + CHICAGO, IL + 60606 + (312) 726-0070

NATIONAL FUTURES ASSOCIATION

October 11, 1982

Ms. Jane K. Stuckey Office of the Secretariat Commodity Futures Trading Commission 2033 K Street, N.W. Washington, D.C. 20581

> Re: National Futures Association; Proposed Amendments to Compliance Rules

Dear Ms. Stuckey:

By letter dated September 14, 1982 from Robert K. Wilmouth, President of National Futures Association ("NFA"), NFA submitted to the Commodity Futures Trading Commission ("CFTC") a proposed amendment to NFA Compliance Rules. In that letter NFA undertook to notify the CFTC by supplemental letter of the date of its adoption by the Board of Directors of NFA.

Please be advised that the above-referenced amendment to NFA Compliance Rules was adopted by unanimous written consent of the Provisional Board of Directors of NFA dated as of May 18, 1982.

> Very truly yours, NATIONAL FUTURES ASSOCIATION

Joseph H. Harrison, Jr. General Counsel and Secretary

JHH:cv cc: Theodore W. Urban bcc: R. K. Wilmouth Dan Driscoll Jan Saran