Chairman Heath Tarbert, Chairman Christopher Kirkpatrick, Secretary Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, NW Washington, DC 20581

Re: Cross-Border Application of the Registration Thresholds and Certain Requirements Applicable to Swap Dealers and Major Swap Participants (RIN 3038-AE84)

Dear Chairman and Secretary:

The Americans for Financial Reform Education Fund wrote a letter urging the Commission to strengthen a proposed rule that would fatally weaken the implementation of Title VII of Dodd-Frank and its application to CFTC-regulated derivatives markets. The Commission should step back from course outlined in the proposed rule and restore other regulations for better oversight of derivatives markets.

Re: Full letter: <a href="https://ourfinancialsecurity.org/wp-content/uploads/2020/03/AFR-Education-Fund-Comment-on-Cross-Border-Proposal.pdf">https://ourfinancialsecurity.org/wp-content/uploads/2020/03/AFR-Education-Fund-Comment-on-Cross-Border-Proposal.pdf</a>

Take time to review these comments and give them the weight they deserve.

Yours sincerely, Robert E. Rutkowski

cc:

Representative Steny Hoyer House Majority Leader Legislative Correspondence Team 1705 Longworth House Office Building Washington DC 20515

2527 Faxon Court Topeka, Kansas 66605-2086