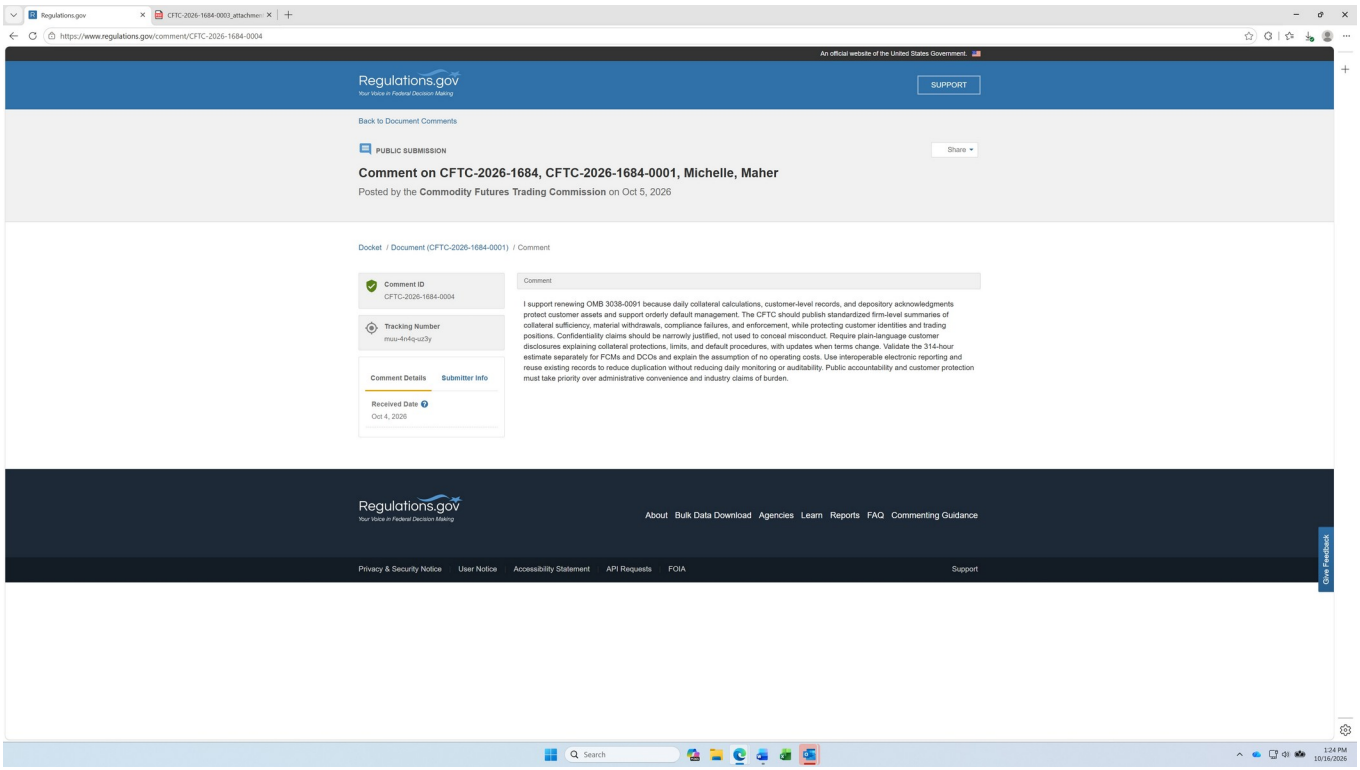

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Comment ID
CFTC-2026-1684-0004
Tracking Number
mxu-4n4q-uz3y
Comment Details
Submitter Info
Received Date
Oct 4, 2026
Comment
I support renewing OMB 3038-0091 because daily collateral calculations, customer-level records, and depository acknowledgments protect customer assets and support orderly default management. The CFTC should publish standardized firm-level summaries of collateral sufficiency, material withdrawals, compliance failures, and enforcement, while protecting customer identities and trading positions. Confidentiality claims should be narrowly justified, not used to conceal misconduct. Require plain-language customer disclosures explaining collateral protections, limits, and default procedures, with updates when terms change. Validate the 314-hour estimate separately for FCMs and DCOs and explain the assumption of no operating costs. Use interoperable electronic reporting and reuse existing records to reduce duplication without reducing daily monitoring or auditability. Public accountability and customer protection must take priority over administrative convenience and industry claims of burden.
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