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There has been recent talk regarding the expansion of Portfolio Margin to Equity Options, Security Futures and Stock. This definitely is the way of the future as it is the best way to quantify risk in a portfolio.

The current Portfolio Margin Rules limit this type of margining to Investors with \$5 million in capital. Currently only a select few (if any) benefit from this type of Margin because of this requirement. It is my understanding that the next proposal that a SRO proposes will look to expand the scope to other instruments but will also include this \$5 million requirement. This restrictive requirement in effect limits its scope thus Retail Brokers will not find it worthwhile to implement. Every individual investor should benefit from this new form of Margin not just a select few.

Currently the CME and OneChicago are pushing Portfolio Margin and only this competitive pressure is forcing the Option Exchanges to consider appropriate changes. It is my opinion that the SEC should work proactively with the appropriate SRO's and come up with a fair Margin policy, one that truly reflects the risk of a portfolio for all investors.

thanks,

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