LONDON METAL EXCHANGE

10 June 2003

Mr Fabrice Demarigny
Secretary General
CESR
11/13 Avenue de Friedland
75008, Paris
France
Room ASP 14E 116

mailto:fdemarigny@europefesco.org

Dear Mr Demarigny

**Consultation Paper: Market Abuse Additional Level 2 Implementing Measures**

The London Metal Exchange (LME) welcomes the consultation document from CESR seeking comment on the advice that CESR proposes to give to the European Commission on technical implementing measures under the Directive on Insider Dealing and Market Manipulation (Market Abuse). We appreciate the fact that the proposed advice appears to take account of comments made by representatives of the EU commodity derivatives markets who attended the 3 March 2003 Paris meeting with members of the CESR expert group on market abuse, as well as comments made in writing by the UK commodity derivative exchanges jointly and by the LME separately in response to the call for evidence made in February 2003.

Nevertheless, the LME has some issues on the proposed advice. Having seen copies of the response of FESE and commented to the International Petroleum Exchange (IPE) on its joint response with the and the Futures and Options Association (FOA), we know that these bodies submissions share our thoughts on relevant issues. Accordingly, as we have no wish to burden CESR with unnecessary paperwork, we will simply record that we agree with both of their responses.

Yours sincerely

Neil McGeown
LME Regulation & Compliance

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cc: Mr Stavros Thomadakis, Chairman, CESR Expert Group on Market Abuse.