

# COVINGTON & BURLING LLP

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October 26, 2010

## Sent Via E-mail

John Dolan  
Alternate Designated Agency Ethics Officer  
Office of the General Counsel  
U.S. Commodity Futures Trading Commission  
1155 21<sup>st</sup> Street, N.W.  
Washington, DC 20581

Re: Reporting Requirement Pursuant to Commission Regulation  
Section 140.735-6(e)

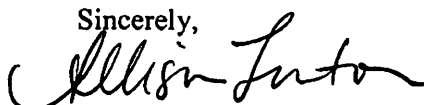
Dear Mr. Dolan:

As you know, I departed the U.S. Commodity Futures Trading Commission (“CFTC” or “Commission”) on August 13, 2010. Pursuant to our communications, I understand that the one year no contact provision of the ethics regulations enforcing 18 U.S.C. 207 does not apply to me because my base salary did not reach the statutory amount that implements the no contact restriction of the ethics regulations. There are no further ethics restrictions applicable to me to represent clients before the CFTC other than my professional ethics obligations.

In addition, pursuant to the reporting requirement under Commission Regulation Section 140.735-6(e), I may be required to file a report to appear before or communicate with the Commission. Therefore, this letter serves as such a report to inform the Commission that I am employed by Covington & Burling LLP, and I will appear before and communicate with the Commission and Staff from time to time on behalf of clients.

If my understanding of the above is incorrect, or if you have any questions, I ask that you let me know as soon as possible.

Please confirm that you have received this notice.

Sincerely,  
  
Allison P. Lurton