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To: EBSA, E-ORI - EBSA
Subject: RIN 1210-AB32

"(c) An "Asset," for purposes of this exemption.... **Excluded from this definition is any equity security that is a security future or a put, call, straddle, or other option or privilege of buying an equity security from or selling an equity security to another without being bound to do so.**"

This exclusion should NOT include options; i.e. puts, calls and or straddles.
Thank you.
Peter Gaillard