CHICAGO MERCANTILE EXCHANGE INC.

COMMENT

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James J. McNulty President and Chief Executive Officer 312 / 930-3100 Fax: 312 / 648-3625 jmcnulty@cme.com

C. OF THE SECRETARIAT August 10, 2001

VIA FACSIMILE

Ms. Jean A. Webb Office of the Secretariat Commodity Futures Trading Commission Three LaFayette Centre 1155 21st Street, N.W. Washington, DC 20581

Re: Proposed Dual Trading Regulations

Dear Ms. Webb:

On July 11, 2001, the Commodity Futures Trading Commission ("Commission") published for comment proposed regulations that would restrict dual trading by floor brokers in security futures products. Chicago Mercantile Exchange Inc. ("CME") believes that customer confidence in the integrity of the markets is crucial for the success of new contracts such as security futures products. The Commission's proposed dual trading regulations for security futures products appropriately balance customer protection with regulatory oversight and CME supports the proposed regulations.

Very truly yours,

James J. McNulty

cc:

Honorable James E. Newsome, Acting Chairman

Honorable Barbara Pedersen Holum

Honorable David D. Spears Honorable Thomas J. Erickson

SMS/:mm 2417 ltr