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August 31, 2004

**SENT VIA E-MAIL**

Ms. Jean A. Webb  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

**Re: Submission pursuant to Commission Regulation Section 40.6(a)**

Dear Ms. Webb:

- I. **Certification.** The Kansas City Board of Trade ("KCBT") hereby gives notification to the Commission pursuant to Commission Regulation Section 40.6(a), of its intention to amend Rules 2407.00 and 2606.00 pertaining to the venue (location) for trading Value Line stock index futures and options contracts. The Board of Directors, in a regular meeting held on August 31, 2004, acting pursuant to authority granted them under Rules 2403.00 and 2601.00, approved the aforementioned amendments. KCBT certifies to the Commission that the amendments to Rules 2407.00 and 2606.00 are in compliance with the Commodity Exchange Act and the regulations thereunder.
- II. **Date of Implementation.** Amended Rules 2407.00 and 2606.00 shall become effective as of the launch date of the exchange's Electronic Trading System, currently estimated to be sometime in December of this year.
- III. **Substantive Opposing Views.** To the knowledge of the Board of Directors and staff, no substantive opposing views were expressed by members or others regarding amended Rules 2407.00 and 2606.00.
- IV. **Text of Amended Rules.** The text of the amended Rules is shown as follows, with additions underlined and deletions lined out:

**2407.00 Location.** Trading will occur on the Electronic Trading System ~~trading floor of the Kansas City Board of Trade at a place designated by the Board of Directors~~, provided however, that trading may be conducted by open outcry in the Value Line pit on the trading floor only during times when the Electronic Trading System is unavailable (due to technical failure, etc.) and only between the hours of 8:30 a.m. and 3:15 p.m. Central time.

**2606.00 Location.** Trading will occur on the Electronic Trading System ~~trading floor of the KCBT at a place designated by the Board of Directors~~, provided however, that trading may be conducted by open outcry in the Value Line pit on the trading floor only during times when the Electronic Trading System is unavailable (due to technical failure, etc.) and only between the hours of 8:30 a.m. and 3:15 p.m. Central time.

Ms. Jean A. Webb  
August 31, 2004  
Page 2 of 2

- V. **Rationale for Action Taken.** The Board amended Rules 2407.00 and 2606.00 to make clear of its intent to only offer Value Line stock index futures and option contracts for trading on the exchange's Electronic Trading System as of the launch date of such system. The one exception made was during times when the system was unavailable for trading (due to technical failure, etc.) between the hours of 8:30 a.m. and 3:15 p.m. Central time. At such times, the contracts may be offered for trading on the floor of the exchange by open outcry.

Any questions regarding this submission should be directed to the undersigned at 816-753-7500.

Sincerely,

Jeff C. Borchardt  
President

Cc: Rick Shilts – CFTC Washington  
Tom Bloom – CFTC Kansas City  
Robin Hagedorn – CFTC Kansas City