

January 3, 2005

BY EMAIL

Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

Re: Certification: New York Mercantile Exchange, Inc.  
Submission #04.182 (Listing of Additional Strike Prices for the  
Gold and Copper Option Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c) and COMEX Rule 17.04, the President of the New York Mercantile Exchange, Inc. ("Exchange") has directed that additional strike prices be added for certain contract months in the Gold and Copper option contracts as detailed below:

- (A) On December 29, 2004, the Exchange added a call and a put:
  - (1) at the strike prices of 136 and 142 for the May 2005 contract month of the Copper option contract;
  
- (B) On January 3, 2005, the Exchange added a call and a put:
  - (2) at the strike price of 168 for the March 2005 contract month of the Copper option contract;
  - (3) at the strike price of 400 for the March 2005 contract month of the Gold option contract;

Pursuant to the terms of COMEX Rule 15.03(c) and COMEX Rule 17.04, the strike prices noted above are in increments that are consistent with the pricing for the underlying futures contract. COMEX Rule 15.03(c) and COMEX Rule 17.04 permit such directed strike prices to be effective upon adoption, provided that notice to the CFTC is given within three business days of the strike price listing.

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Should you have any questions concerning the above, please contact the undersigned at (212) 299-2207.

Very truly yours,

Brian Regan  
Vice President & Counsel

cc: Christopher K. Bowen  
George Henderson  
Michael Campanelli  
Donna Talamo