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OFC. OF THE SECRETARIAT

September 8, 2005

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

RE: Amendments to Rules Governing Market Surveillance in connection with the Usage of Electronic Devices

**Submitted per Sec. 5c(c)(1) of the CEA and Regulation Sec. 40.6(a).
CME Submission # 05-087.**

Dear Ms. Webb:

Chicago Mercantile Exchange ("CME" or "Exchange") hereby certifies with the Commission the following amendments to the rules governing market surveillance in connection with the usage of electronic devices. The Exchange certifies that these actions neither violate nor are inconsistent with any portion of the Commodity Exchange Act or of the rules thereunder.

The Exchange currently permits the usage of wireless headsets on its trading floors for the purpose of receiving and making business telephone calls. The application for a wireless headset includes a statement that the signatory understands and consents to the authority of the Exchange to record the conversations conducted through such devices. The following addition to the Rule affirms the Exchange's authority in this regard. The text of the rule amendment is as follows, with additions underlined and deletions bracketed and overstruck.

507. ELECTRONIC DEVICES

[Sections A. and B. remain unchanged.]

507.C. Electronic Surveillance

The Exchange may intercept and record any electronic communication received or sent from the trading floor to ensure compliance with Exchange Rules and regulations.

20 South Wacker Drive, Chicago IL 60606-7499, Tel. 312-930-1000

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Exchange members, their employees, and all others who are granted access to the trading floor consent, as a condition of their membership, employment, or access to the floor, to the interception, recording, and use of any such communication.

[The remainder of Chapter 5 remains unchanged.]

Please do not hesitate to contact Mr. Timothy McDermott at 312-648-5433 or tmcdermo@cme.com if any questions arise during the processing of this submission. Please reference our CME Submission #05-087 on all future correspondence for this submission.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Labuszewski". The signature is fluid and cursive, with a large initial "J" and "L".

John W. Labuszewski, Managing Director
Research & Product Development