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OFFICE OF THE SECRETARIAT

October 17, 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 #05.187 (Listing of Additional Strike Prices for the  
Silver, Copper, Heating Oil, Natural Gas and Unleaded Gasoline Option  
Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 16.03, COMEX Rule 17.04 and NYMEX Rule 300.20, the President of the New York Mercantile Exchange, Inc. ("Exchange") has directed that additional strike prices be added for certain contract months in the Silver, Copper, Heating Oil, Natural Gas and Unleaded Gasoline option contracts as detailed below:

- (A) On October 13, 2005, the Exchange added a call and a put:
1. at the strike price of 178 for the November 2005 contract month of the Copper option contract;
  2. at the strike prices of 15150 and 22000 for the December 2005 contract month of the Natural Gas option contract;
  3. at the strike price of 40000 for the January 2006 contract month of the Unleaded Gasoline option contract;
  4. at the strike prices of 25700, 25800, 26400, 33000 and 36500 for the January 2006 contract month of the Heating Oil option contract;
  5. at the strike prices of 16400, 17100, 18200 and 18800 for the February 2006 contract month of the Natural Gas option contract;
  6. at the strike price of 17600 for the March 2006 contract month of the Natural Gas option contract;
  7. at the strike price of 23300 for the April 2006 contract month of the Heating Oil option contract;
  8. at the strike price of 11400 for the June 2006 contract month of the Natural Gas option contract;

9. at the strike price of 11400 for the September 2006 contract month of the Natural Gas option contract;

10. at the strike price of 11400 for the December 2006 contract month of the Natural Gas option contract;

11. at the strike price of 1100 for the December 2007 contract month of the Silver Gas option contract;

(B) On October 14, 2005, the Exchange added a call and a put:

12. at the strike price of 13700 for the December 2005 contract month of the Natural Gas option contract;

13. at the strike prices of 23000 and 26000 for the January 2006 contract month of the Natural Gas option contract;

14. at the strike prices of 31000 and 34000 for the January 2006 contract month of the Heating Oil option contract;

15. at the strike prices of 26300 and 45000 for the February 2006 contract month of the Heating Oil option contract;

16. at the strike prices of 17600, 22500 and 23000 for the February 2006 contract month of the Natural Gas option contract;

17. at the strike prices of 16150, 17250 and 22500 for the March 2006 contract month of the Natural Gas option contract;

18. at the strike price of 1050 for the May 2006 contract month of the Silver option contract;

(C) On October 17, 2005, the Exchange added a call and a put:

19. at the strike price of 40000 for the December 2005 contract month of the Unleaded Gasoline option contract;

20. at the strike price of 30500 for the January 2006 contract month of the Heating Oil option contract;

21. at the strike price of 33500 for the February 2006 contract month of the Heating Oil option contract;

22. at the strike price of 30000 for the February 2006 contract month of the Natural Gas option contract;

23. at the strike prices of 14950 and 16650 for the March 2006 contract month of the Natural Gas option contract; and

24. at the strike prices of 11400 for the March 2007 contract month of the Natural Gas option contract.

Pursuant to the terms of COMEX Rule 16.03, COMEX Rule 17.04 and NYMEX Rule 300.20, the strike prices noted above are in increments that are consistent with the pricing for the underlying futures contract. COMEX Rule 16.03, COMEX Rule 17.04 and NYMEX Rule 300.20 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.

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