

 **NEW YORK**
BOARD OF TRADE[®]
World Financial Center
One North End Avenue, 13th Floor
New York, New York 10282

BY ELECTRONIC TRANSMISSION

06-4
February 9, 2006

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

RECEIVED
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OFFICE OF THE SECRETARIAT

Re: **Amendments to Rules 7.02 and 7.09 -
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6**

Dear Ms. Webb:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commission Regulation 40.6, the Board of Trade of the City of New York, Inc. ("Exchange") submits, by written certification, amendments to Rules 7.02 and 7.09, attached as Exhibit A.

Licensing Rules 7.02 and 7.09 provide for the licensing of a sugar chemist. None of the present members of either the Domestic or World Sugar Committees know of any reason for the Exchange to license a sugar chemist, and recent history has shown that there has been no need to use one. Therefore, the amendments delete references to the licensing of a sugar chemist.

The Exchange certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The Exchange's Board of Governors approved the amendments at its meeting on February 8, 2006. No substantive opposing views were expressed by members or others with

respect to the amendments. The amendments will go into effect twenty-four (24) hours after filing with the Commission.

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If you have any questions or need further information, please contact me at 212-748-4084.

Sincerely,

Jill S. Fassler
Vice President
Associate General Counsel

cc: Riva Adriance
Thomas Leahy
CFTC, Division of Market Oversight
Allen Cooper
CFTC, New York Regional Office

(In the text of the amendments below, additions are under lined and deletions are bracketed and lined out.)

Rule 7.02. Individual Licensees

(a) To be eligible for an Exchange license as a [~~chemist,~~] classifier or grader, an applicant must be a natural Person at least 18 years of age, of good character and commercial standing and comply with any applicable local, state or federal requirements.

[REMAINDER OF RULE UNCHANGED]

Rule 7.09. [Chemists] Reserved

[~~To be eligible for an Exchange license as a chemist, an applicant must meet such standards as may be set, from time to time, by the Cocoa, Coffee and Pulp Warehouse and License Committee.~~]

EXHIBIT A