

BY ELECTRONIC TRANSMISSION

06-34
December 14, 2006

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

Re: **Amendments to Pulp Rule 23.12 and Appendix I -
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6**

Dear Ms. Donovan:

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 Pulp Rule 23.12 and Appendix I, attached as Exhibit A.

The amendment to Rule 23.12 adds the Port of Changshu, China as an acceptable delivery point for pulp. China is considered the largest and fastest growing market segment for freely traded market pulp, i.e., non-integrated, non-long-term fixed price pulp. Adding a Chinese delivery point will attract additional commercial interest to the Exchange's Pulp Futures contract. There was an opposing view to the amendment. Although in favor of adding the Chinese delivery location, the opposition wanted a new China-only delivery pulp futures contract.

The amendment to Pulp Appendix I, "Exchange Approved Mills/Brands", adds Stora Enso's Oula pine NBSK pulp as good delivery. It was determined that such addition would not affect the underlying value of the contract and as such, recommends that the additional new Mill/Brand become effective for all currently listed delivery months.

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 adopted the amendments on December 13, 2006. The amendment to Rule 23.12 will be implemented after an Exchange Licensed Warehouse facility in the Port of Changshu is approved for all delivery months listed at that time that have no open interest and for all subsequently listed delivery months. The amendment to Appendix I will be implemented for all currently listed delivery months on December 15, 2006. As stated above,

there was an opposing view with respect to the amendment to Rule 23.12. There were no opposing views with respect to the amendment to Appendix I.

If you have any questions or need further information, please contact me at jfassler@nybot.com or 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 underlined and deletions are bracketed and lined out.)

Rule 23.12. Storage and Packaging

(a) In addition to other applicable terms and conditions set forth in the Rules, each Lot of pulp shall, in order to be deliverable under a Pulp Futures Contract, satisfy the following requirements at the time of delivery:

(i) the pulp shall be stored in a duly licensed warehouse in the Port of Antwerp, Port of Rotterdam, Port of Vlissingen, Port of Terneuzen, Port of Changshu, China or the City of Green Bay, Wisconsin or such other port or city as may be added from time to time upon the recommendation of the Pulp Committee and the affirmative vote of two-thirds of the Board;

* * *

[REMAINDER OF RULE UNCHANGED]

**APPENDIX I
EXCHANGE APPROVED MILLS/BRANDS**

<u>MILL/BRAND</u>	<u>COMPANY</u>	<u>NBSK</u>	<u>BSK</u>	<u>Radiata</u>
<i>Europe</i>				
Bohemia	Mondi	*		
Monsteras	Sodra	*		
Morrum	Sodra	*		
Varo	Sodra	*		
Tofte	Sodra	*		
Aanekoski	Botnia	*		
Kemi	Botnia	*		
Rauma	Botnia	*		
Joutseno	Botnia	*		
Kaskinen	Botnia	*		
Munksjo	Smurfit	*		
Karlsborg	Billerud	*		
Skarblacka	Billerud	*		
Norrland	Stora Enso	*		
Enocell	Stora Enso	*		
KP Pine	Stora Enso	*		
Lapponia	Stora Enso	*		
Lumi Pine	Stora Enso	*		
Oula Pine	Stora Enso	*		

* * *

[REMAINDER OF APPENDIX I UNCHANGED]

EXHIBIT A