



June 28, 2011

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

**RE: Voluntary Extension of Review Period for Chicago Mercantile Exchange
Submission of Standard and Poor's 500 Dividend Index futures for
Commission Review and Approval per Section 5c(c) of the CEA and
Regulation §40.3**

Dear Mr. Stawick:

In correspondence dated July 14, 2010, Chicago Mercantile Exchange Group ("CME" or "Exchange") voluntarily submitted S&P 500 Dividend Index futures for Commission review and approval per Section 5c(c) of the CEA and Regulation §40.3 thereunder.¹ The Commission responded via correspondence dated July 22, 2010, indicating that "[t]he proposed contract raises novel and complex issues and concerns ... [thus] in accordance with Commission Regulation 40.3(c), the 45-day Fast-Track review period has been extended, pursuant to the delegated authority of Commission Regulation 40.7(a), by 45 days until October 12, 2010." Subsequently, CME voluntarily consented to further 90-day extensions of the review period until January 10, 2011 via correspondence dated September 27, 2010, a second 90-day extension of the review period until April 10, 2011 via correspondence dated November 24, 2010, and a third 90-day extension of the review period until July 9, 2011 via correspondence dated April 7, 2011.

CME now voluntarily consents to a further 90-day extension of the review period until October 7, 2011. This extension is offered to provide the Commission with further opportunity to consider the complex issues and concerns raised as a result of our submission and in consultation with Commission staff.

If you require any additional information regarding this action, please do not hesitate to contact Mr. John W. Labuszewski, Managing Director, Financial Research & Product Development at 312-466-7469 or via e-mail at jlab@cmegroup.com. Alternatively, you may contact me at (312) 930-8167 or via e-mail at Sean.Downey@cmegroup.com.

¹ CME Submission #10-195

Sincerely,

/s/ Sean Downey
Associate Director and Assistant General Counsel

cc: Mr. Thomas M. Leahy, Jr.
Mr. Phillip Colling