

# OneChicago ✕

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C.F.T.C.  
OFFICE OF THE SECRETARIAT

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CONFIDENTIAL TREATMENT  
REQUESTED

January 26, 2010

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

Re: **Amendment to OneChicago, LLC Operating Agreement  
Submission and Rule Certification**

Dear Mr. Stawick:

On behalf of OneChicago, LLC ("OCX" or "Exchange"), and pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and section 41.24 of the regulations promulgated by the Commission under the Act, submitted herewith is an amended version of the Operating Agreement for OneChicago, LLC reflecting the addition of Public Directors. The changes are reflected in Sections 9.2 and 9.3. The amendment version of the Operating Agreement authorizes OneChicago's compliance with Section 5(d)(15) (Core Principle 15) of the Act that, among other things, mandates Public Directors as an acceptable practice.

Please note that confidential treatment for Exhibit A of the Operating Agreement is being requested concurrently.

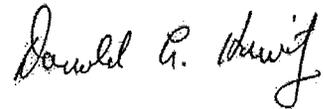
The proposed new rules are included as Attachment A. Deleted materials are show with a strikethrough (---) and new material is underlined (\_\_\_).

These Amended Operating is effective as of January 1, 2010.

There are no opposing views that are not incorporated into this rule amendment.

On behalf of OCX, I hereby certify that the amendment complies with the Act and the regulations promulgated thereunder.

Sincerely,

A handwritten signature in cursive script, appearing to read "Donald L. Horwitz".

Donald L. Horwitz  
Managing Director and General Counsel

Encl: Attachment A