



CME Group

A CME/Chicago Board of Trade/NYMEX Company

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OFFICE OF THE SECRETARIAT
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April 28, 2010

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

**RE: CME/CBOT/NYMEX Rule 949 ("Credit Control Policy")
CME/CBOT/NYMEX Submission No. 10-082**

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME"), The Board of Trade of the City of Chicago, Inc. ("CBOT") and New York Mercantile Exchange, Inc. ("NYMEX") (collectively, the "Exchanges") hereby notify the Commodity Futures Trading Commission of new Rule 949 ("Credit Controls"). This new rule requires clearing firms to use credit control policies developed and offered by CME Clearing. Any Exchange required backstop credit controls are in addition to a clearing members credit controls.

The text of the new rule is attached. The amendment is effective immediately. The Exchanges certify that the new rule complies with the Commodity Exchange Act and regulations thereunder.

If you have any questions regarding this change, please contact me at 312.648.5422. Please reference CME/CBOT/NYMEX Submission No. 10-082 in any related correspondence.

Sincerely,

/s/ Stephen M. Szarmack
Regulatory Counsel

CME/CBOT/NYMEX RULE

949. CREDIT CONTROLS

Clearing Members shall comply with all credit control policies developed by the Exchange for customer and proprietary transactions. Such credit control policies may include, but not be limited to, registration of credit control administrators with the Exchange, definition of credit control limits, and maintenance of written procedures verifying compliance with Exchange credit control requirements. For general reference purposes, credit control functionality that may be developed for Globex is a system or service pursuant to Rule 578. Any credit control functionality required by the Exchange shall be in addition to a clearing member's internal risk monitoring and credit control procedures.