



Sean M. Downey  
Director and Assistant General Counsel  
Legal Department

October 2, 2012

**VIA E-MAIL**

Ms. Sauntia Warfield  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, DC 20581

**RE: Withdrawal of CME/CBOT/NYMEX/COMEX Submission No. 12-299 (Revisions to Rule 559 ("Position Limit and Exemptions"))**

**Submission No. 12-299W**

Dear Ms. Warfield:

On September 26, 2012, Chicago Mercantile Exchange, Inc. ("CME"), The Board of Trade of the City of Chicago, Inc. ("CBOT"), the New York Mercantile Exchange, Inc. ("NYMEX") and Commodity Exchange, Inc. ("COMEX"), (collectively, the "Exchanges") submitted a self-certification to the Commodity Futures Trading Commission ("Commission") concerning revisions to each Exchange's Rule 559 ("Position Limits and Exemptions") in order to comply with Commission Regulations under Part 151 (Position Limits for Futures and Swaps) released on November 18, 2011.

Based on the September 28, 2012, ruling by the U.S. District Court for the District of Columbia, whereby they vacated and remanded the Position Limits for Futures and Swaps Rule for further proceedings consistent with the court's opinion, the aforementioned revisions to Rule 559 are no longer necessary and the Exchanges withdraw Submission No. 12-299 at this time.

If you have any questions regarding this submission, please contact me at 312.930.8167 or via email at [Sean.Downey@cmegroup.com](mailto:Sean.Downey@cmegroup.com). Please reference CME/CBOT/NYMEX/COMEX Submission No. 12-299W in any related correspondence.

Sincerely,

/s/ Sean Downey  
Director & Assistant General Counsel