



September 28, 2010

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

**RE: Voluntary Extension of Review Period for Chicago Mercantile Exchange Inc. 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 Inc. ("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.<sup>1</sup> 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."

CME now voluntarily consents to a further 90-day extension of the review period until January 10, 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 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](mailto:jlab@cmegroup.com) or me at 312-648-5422.

Sincerely,

/s/ Stephen M. Szarmack  
Regulatory Counsel

Att.

cc: Mr. Thomas M. Leahy, Jr.  
Mr. Steven B. Benton

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<sup>1</sup> CME Submission #10-195