

October 31, 2006

Ms. Eileen A. Donovan
Acting Secretary
Commodity Futures Trading Commission
Three Lafayette Center
1155 21<sup>st</sup> Street, N.W.
Washington, D.C. 20581

Reference File # 2735.01 Rule Certification

Dear Ms. Donovan:

Pursuant to Commission Regulation 40.6(a), the Chicago Board of Trade (CBOT®) hereby submits the following:

- Early listing of July 2009 Soybean and mini-sized Soybean futures.

These futures contracts ordinarily would be authorized for trading as of November 15, 2006. Due to customer demand, the Exchange intends to list these contracts earlier than usual (i.e., as of November 1, 2006).

This is a one-time change, rather than a permanent revision, in the Exchange's listing cycle.

There were no opposing views with respect to this action.

The CBOT certifies that this action complies with the Commodity Exchange Act and the rules thereunder.

Sincerely,

Paul J. Draths Vice President and Secretary