



World Financial Center
One North End Avenue
New York, New York 10282

BY ELECTRONIC TRANSMISSION

06-35

December 14, 2006

Ms. Eileen A. Donovan
Acting Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: **Amendment to Rule 6.24(c) -
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6**

Dear Ms. Donovan:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commission Regulation 40.6, the Board of Trade of the City of New York, Inc. ("Exchange") submits, by written certification, an amendment to Rule 6.24(c), attached as Exhibit A, which clarifies the treatment of positions in the new Small New Zealand dollar-U.S. dollar futures contract ("the Small Contract") (see Submission 06-31).

The amendment provides that for position limit purposes, positions in the Small Contract will be aggregated with positions in the regular-sized New Zealand dollar-U.S. dollar contract, and that, in this process, the conversion will be accomplished by multiplying the number of Small Contracts by one-half (as it is one-half the size of the regular-size contract). This treatment of positions in the two New Zealand dollar-U.S. dollar contracts is consistent with the way in which the Exchange already handles positions in other instances in which different-sized contracts are listed for trading.

The Exchange certifies that the amendment complies with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The amendment was adopted by the Exchange's Board of Governors on December 13, 2006. It will become effective immediately. No substantive opposing views were expressed by members or others with respect to the amendments.

If you have any questions or need further information, please contact me at jfassler@nybot.com or 212-748-4084.

Sincerely,

Jill S. Fassler
Vice President
Associate General Counsel

cc: Riva Adriance
Thomas Leahy
CFTC, Division of Market Oversight
Allen Cooper
CFTC, New York Regional Office

(In the text of the amendments below, additions are underlined.)

Rule 6.24. Position Limits and Position Accountability for Financial Contracts

* * *

(c) Australian and New Zealand Dollar Based

(i) A Person holding or controlling five thousand (5,000) or more Exchange Futures Contracts and Futures Equivalent Contracts net long or net short in either (1) all of the kiwi-dollar or (2) all of the Aussie-kiwi months combined:

(A) automatically consents not to increase further those positions when so ordered by the Exchange acting in its own discretion; and

(B) shall provide, in a timely manner, information on the nature of that Person's related cash, Exchange Futures and Options Contracts positions, trading strategy and/or hedging strategy. Nothing in this Rule limits the authority of the Exchange to take action under Rules 6.11 and 6.12 or to request and collect any information regarding that Person's related cash and Exchange and Options Futures Contracts positions.

(ii) In computing net positions for the purposes of this Rule, one-half of the net position in the small kiwi-dollar futures contract shall be combined with positions in the kiwi-dollar futures contract.

[REMAINDER OF RULE UNCHANGED]

EXHIBIT A