

BY ELECTRONIC TRANSMISSION

07-14
February 15, 2007

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

OFFICE OF THE SECRETARIAT

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Re: **Amendments to Rule 27.18 -**
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, amendments to Rule 27.18, attached as Exhibit A.

Because the trading hours for electronic trading on the ICE Platform will be constantly changing during the period of initial implementation, the Exchange has amended Rule 27.18 to provide that electronic trading will take place during such hours as the Exchange determines from time to time. In addition, the following Board Resolution was adopted:

RESOLVED, that the President, General Counsel and the Senior Vice President of Market Development, acting individually, are hereby authorized to alter and change the electronic trading hours after consultation with senior management and subject to any CFTC filing requirements with respect to implementation of any such change.

In accordance with the above Resolution, the General Counsel and Senior Vice President, after consultation with senior management, have changed the hours of the Pre-Open Trading Session from 1:15 AM until 1:30 AM to 8:00 PM of the prior day until 1:30 AM of the trade date for all

commodity contracts except for FCOJ. The change in hours for the Pre-Open Trading Session will become effective on February 19, 2007.

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The Exchange certifies that the amendments, Resolution and change in trading hours comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The Exchange's Board of Directors adopted the amendments and the Resolution by Unanimous Written Consent in accordance with Bylaw Section 4.7 on February 15, 2007. The amendments and Resolution will be implemented on February 16, 2007. 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 212-748-4084 or at jfassler@nybot.com.

Sincerely,

Jill S. Fassler
Vice President
Associate General Counsel

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

(In the text of the amendments below, additions are underlined and deletions are bracketed and lined out.)

27.18. Trading Hours

(a) ~~[Unless otherwise specified, t]~~The ETS trading hours [of] shall be specified by the Exchange from time to time. [shall be as follows:

~~(i) Agriculture Contracts ETS Trading Hours~~

CONTRACT	PRE-OPEN TRADING SESSION	OPEN	CLOSE
Cocoa Futures	1:15-1:30 AM	1:30 AM	3:15 PM
Coffee "C" Futures	1:15-1:30 AM	1:30 AM	3:15 PM
Cotton No. 2 Futures	1:15-1:30 AM	1:30 AM	3:15 PM
FCOJ Futures	6:45-7:00 AM	7:00 AM	3:15 PM
Sugar No. 11 Futures	1:15-1:30 AM	1:30 AM	3:15 PM
Sugar No. 14 Futures	1:15-1:30 AM	1:30 AM	3:15 PM]

(b) On the Last Trading Day for each Exchange Futures Contract, the Trading Session will end at the same time as the Floor Trading Session ends as detailed in Rule 4.07.

EXHIBIT A