

BY ELECTRONIC TRANSMISSION

07-19
March 8, 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

2007 MAR -8 PM 4:35
OFC. OF THE SECRETARIAT

RECEIVED
CFTC

Re: **Rules 6.17, 6.18 and 6.22 -
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 Rules 6.17, 6.18 and 6.22, attached as Exhibit A.

The amendments establish a single month accountability level in the Cocoa, Coffee and Sugar No. 11 contracts. Currently, the Rules only set an all months combined position accountability level. By adding a single month accountability level, the Exchange will have more flexibility in preventing potential problems arising from excessively large positions.

The amendments were adopted by the Exchange's Board of Directors at its meeting on March 8, 2007 and will go into effect on March 12, 2007. The Exchange certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. 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
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 6.17. Position Limits and Position Accountability for Cocoa Contracts

(a) A Person holding or controlling six thousand (6,000) or more Exchange Futures Contracts and Futures Equivalent Contracts, net long or net short, in any single Cocoa month or in all Cocoa months combined:

[REMAINDER OF RULE UNCHANGED]

Rule 6.18. Position Limits and Position Accountability for Coffee "C" Contracts

(a) A Person holding or controlling five thousand (5,000) or more Exchange Futures Contracts and Futures Equivalent Contracts net long or net short in any single Coffee "C" month or in all Coffee "C" months combined:

[REMAINDER OF RULE UNCHANGED]

Rule 6.22. Position Limits and Position Accountability for Sugar No. 11 Contracts

(a) A Person holding or controlling nine thousand (9,000) or more Exchange Futures Contracts and Futures Equivalent Contracts net long or net short in any single Sugar No. 11 month or in all Sugar No. 11 months combined:

[REMAINDER OF RULE UNCHANGED]

EXHIBIT A