

BY ELECTRONIC TRANSMISSION

07-30 May 1, 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

Re: Amendments to Russell Complex Rules 19.02, 19.04 and 19.15 and Resolution to Delist Expiration Months and Relist with Increased Size 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 19.02, 19.04 and 19.15, attached as Exhibit A, and a Resolution to delist the September and December 2007 and March 2008 expiration months for the Russell 1000[®] Mini futures contract and relist such months with the new contract size.

The amendments to Rules 19.02, 19.04 and 19.15 increase the size of the Russell 1000 Mini futures contract from 1/10 to 1/5 of the size of the standard Russell 1000 Index futures contract. The 1/5 size has a multiplier of one hundred dollars (\$100) times the Russell 1000 Index, giving the contract a notional value equal to the notional value of the Russell 1000 Index futures contract traded at the Chicago Mercantile Exchange ("CME") and a notional value similar to the S&P 500 Mini futures contract also traded at the CME.

The Exchange also adopted a Resolution delisting the expiration months of September and December 2007 and March 2008 of Russell 1000 Mini futures contract as of the close of business on May 2, 2007, as long as there is no open interest in such contract months, and relisting said months with the new contract size.

The Exchange certifies that the amendments and the Resolution 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 at its meeting on May 1, 2007. In accordance with the Resolution, the above-stated expiration months

-2-

will be delisted as of the close of business May 2, 2007, and the amendments will be implemented with the relisting of said delisted expiration months on a date determined by the President of the Exchange. No substantive opposing views were expressed by members or others with respect to the amendments and the Resolution.

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 and deletions are bracketed and lined out.)

Rule 19.02. Price Basis

* * *

(b) Notwithstanding paragraph (a) of this Rule, the dollar value of the minimum price fluctuation in the Russell 1000 Mini Index Futures Contract shall be [two] five dollars [and fifty cents] (\$[2.50]5.00).

Rule 19.04. Final Settlement of Futures Contracts

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(d) Notwithstanding paragraph (c) of this Rule, the amount to be paid in final settlement of each Russell 1000 Mini Index Futures Contract shall be determined by multiplying \$[0.5]1.00 times the basis point difference between the Settlement Price of the previous trading day for such contract and the final Settlement Price of the Russell 1000 Index to the nearest .01.

[REMAINDER OF RULE UNCHANGED]

Rule 19.15. Obligations of Parties to Contract

- (a) The seller under the Russell 1000 Mini Index Futures Contract agrees to sell to the Purchaser, and the Purchaser agrees to purchase from the seller, [fifty] one hundred dollars (\$[5]100) times the Russell 1000 Index in accordance with the Rules and the Clearing Organization Rules.
- (b) The Russell 1000 Mini Index Futures Contract shall be the equivalent of [fifty] one hundred ([5]100) times the Russell 1000 Index.

EXHIBIT A