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

CFC. OF THE SECRETARIAT

Reference File # 2796.01
Rule Certification

Dear Ms. Donovan:

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

- **Amendments to Regulations 290.03, 331.08, 425.06 and CBOT Rulebook Appendix 4C per the attached texts (additions in boldface and underlined; deletions in bold face and struck through).**

With respect to CBOT Credit Default Swap ("CDS") Index futures, the referenced amendments will codify the following:

- In Regulation 290.03, designation in the "IDEM" market category,
- In Regulation 331.08, eligibility for "Exchange of Futures for Related Transactions";
- In Regulation 425.06, position accountability; and
- In Rulebook Appendix 4C (incorporated by reference into Regulation 425.01), position limits and reportable position levels.

The CBOT intends to implement these amendments concurrently with the launch of trading in CBOT CDS Index futures (presently scheduled for trade date June 25, 2007).

There were no opposing views concerning these amendments.

The CBOT certifies that these amendments comply with the Commodity Exchange Act and the rules thereunder.

Sincerely,

Paul J. Draths
Vice President and Secretary

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290.03 Index, Debt and Energy Market (IDEM)- The IDEM consists of the following futures contracts: 30-Day Fed Fund, Portfolios (when designated), Stock Indexes, CBOT[®] Dow Jones-AIG Commodity Indexsm, CBOT[®] Dow Jones-AIG Excess Return Commodity Indexsm, CBOT[®] X-Fund, Corporate Bond Index, Commercial Paper (30 days), Commercial Paper (90 days), Municipal Bonds (when designated), 10-Year Municipal Note Index, Municipal Bond Index, Eurodollars, Crude Oil (when designated), Leaded Gasoline (when designated), Unleaded Gasoline (when designated), Heating Oil (when designated), Silver, Gold, Gold Coins (when designated) Plywood, Structural Panel Index, CBOT U.S. Dollar Composite Index, CBOT Argentina, Brazil and Mexico Brady Bond Indexes, U.S. Treasury Yield Curve Spread, ComEd[™], TVA Hub Electricity, ~~and~~ CBOT[®] Dow Jonessm US Real Estate Index, and Credit Default Swap Index.

331.08 Exchange of Futures for Related Transactions

(a) The following transactions may be executed outside of the Exchange's central markets, in accordance with the requirements of this Regulation.

(i) Exchanges of futures for, or in connection with, cash commodities ("Exchange for Physical Transactions" or "EFPs"). EFPs may be executed in all CBOT futures contracts.

(ii) Exchanges of futures for, or in connection with, swap transactions ("Exchange for Swap Transactions" or "EFSs"). EFSs may be executed only in U.S. Treasury Bond futures; Long Term, Medium Term, and Short Term U.S. Treasury Note Futures; CBOT Dow Jones-AIG Excess Return Commodity Indexsm.Futures; ~~and~~ 30-Year, 10-Year and 5-Year Interest Rate Swap Futures; and Credit Default Swap Index Futures.

(iii) Exchanges of futures for, or in connection with, over-the-counter derivatives ("OTC") transactions ("Exchange for Risk Transactions" or "EFRs"). EFRs may be executed only in CBOT agricultural commodity futures and in U.S. Treasury Bond Futures; Long Term, Medium Term, and Short Term U.S. Treasury Note Futures; CBOT Dow Jones-AIG Excess Return Commodity Indexsm Futures; 30-Day Fed Fund Futures; ~~and~~ 30-Year, 10-Year, and 5-Year Interest Rate Swap Futures; and Credit Default Swap Index Futures. The OTC component of an EFR must comply with any applicable regulatory requirements prescribed by the Commodity Futures Trading Commission.

(iv) Options on futures are not a permissible component of an EFP, EFS or EFR.

For purposes of this Regulation, all EFPs, EFSs and EFRs shall be referred to as Exchanges of Futures for Related Positions.

425.06 Position Accountability - A person, as defined in Regulation 425.01(a)(i), who holds or controls, or a member firm that carries for another person, aggregate positions in excess of those specified in the chart below, shall be subject to the following provisions:

- Such person shall provide, in a timely manner upon request by the Exchange, information regarding the nature of the position, trading strategy, and hedging information if applicable.
- Such person shall be deemed to have consented, when so ordered by the Exchange acting in its discretion, not to further increase the positions which exceed the levels specified in the chart below.
- Such positions must be initiated and liquidated in an orderly manner.

For purposes of this regulation, all positions in accounts for which a person, by power of attorney or otherwise, directly or indirectly controls trading shall be included with the positions held by such person. The provisions of this regulation shall apply to positions held by two or more persons acting pursuant to an expressed or implied agreement or understanding, the same as if the positions were held by a single person.

Nothing herein shall limit the jurisdiction of the Exchange.

CONTRACT	SPOT MONTH*	ALL MONTHS**	OPTIONS***
US Treasury Bonds	10,000	10,000	25,000
10-Yr. Treasury Notes	7,500	7,500	20,000
5-Yr. Treasury Notes	7,500	7,500	20,000
2-Yr. Treasury Notes	7,500	7,500	20,000
30-Day Fed Funds	3,000	3,000	
Binary Options on the Fed			3,000
30-Yr. Interest Rate Swap	5,000	5,000	
10-Yr. Interest Rate Swap	5,000	5,000	15,000
5-Yr. Interest Rate Swap	5,000	5,000	15,000
Credit Default Swap Index	500	500	

* All numbers refer to futures contracts, and/or futures-equivalent contracts, net long or net short, in the spot month.

** All numbers refer to futures contracts, and/or futures-equivalent contracts, net long or net short in all months and strike prices combined. Net equivalent futures positions shall be determined in the same manner specified in Appendix 4C.

***All numbers refer to option contracts for all months and all strike prices combined in each option category (long call, long put, short call, and short put). (03/19/07)

Appendix 4C

Position Limits and Reportable Positions

The following are definitions of titles used in the position limit chart contained in this Appendix -

Spot Month- Spot month futures-equivalent position limit net long or net short effective at the start of trading on the first business day prior to the first trading day of the spot month.

Single Month- Futures-equivalent position limit net long or net short in any one month other than the spot month.

All Months -Position limit net long or net short in all months and all strike prices combined. Note: Long futures contracts, long call options, and short put options are considered to be on the long side of the market while short futures contracts, long put options, and short call options are considered to be on the short side of the market. For each commodity, the futures-equivalents for both the options and futures contracts are aggregated to determine compliance with the net long or net short same side position limits.

Reportable Futures Level-Reportable futures position in any one month.

Reportable Options Level-Reportable options position in any one month in each option category.
 Note:Option categories are long call, long put, short call, and short put.

Net Equivalent Futures Position-Each option contract will be adjusted by the prior day's risk factor, or delta coefficient, for that option which has been calculated by the Exchange's Clearing Services Provider

For the purpose of this Appendix:

(i) An option contract's futures-equivalency shall be based on the prior day's delta factor for the option series, as published by the Exchange's Clearing Services Provider. For example, 8 long put contracts, each with a delta factor of 0.5, would equal 4 futures-equivalent short contracts.

(ii) Long futures contracts shall have a delta factor of +1, and short futures contracts shall have a delta factor of -1.

(iii) Long call options and short put options shall have positive delta factors.

(iv) Short call options and long put options shall have negative delta factors.

(v) An eligible option/option or option/futures spread is defined as an intra-month or inter-month position in the same Chicago Board of Trade product in which the sum of the delta factors is zero.

(Note: All position limits and reportable positions are in number of contracts and are based on futures or Net Equivalent Futures Positions, as defined above.

	*SPOT	*SINGLE	*ALL	*REPORTABLE	*REPORTABLE
CONTRACT	MONTH	MONTH	MONTH	FUTURES LEVEL	OPTIONS LEVEL
<u>Credit Default Swap</u>	<u>None</u>	<u>None</u>	<u>None</u>	<u>200</u>	
<u>Index Futures</u>					