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 **NEW YORK**
BOARD OF TRADE®
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One North End Avenue, 13th Floor
New York, New York 10282

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07-36
June 6, 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: **Request for Commission Rule Approval: Amendment to Rule 6.19 -
Submission Pursuant to Section 5c(c)(2) of the Act and Regulation 40.4(a)**

Dear Ms. Donovan:

Pursuant to Section 5c(c)(2) of the Commodity Exchange Act, as amended, and Commission Regulation 40.4(a), the Board of Trade of the City of New York, Inc. ("Exchange") is requesting approval of an amendment to Rule 6.19, attached as Exhibit A.

The Exchange has amended Rule 6.19 to raise the Any One Month speculative position limit for Cotton No. 2 futures and options contracts to 3,500 futures equivalent contracts from the previous 2,500 contract level. The increase brings the Exchange limit for this category to the same level provided for in Commission Regulation 150.2. This amendment will bring all of the Exchange's Cotton No. 2 position limit levels to the same levels contained in the Regulation.

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

The amendment to Rule 6.19 was adopted by the Exchange's Board of Directors by written unanimous consent in accordance with By-Law Section 4.7 on May 31, 2007 and will go into effect on a date set by the President for all delivery months currently listed whether or not there is open interest and all subsequently listed delivery months. No substantive opposing views were expressed by members or others with respect to the amendment.

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

Sincerely,

Jill S. Fassler
Vice President
Associate General Counsel

cc: Riva Adriance
Thomas Leahy
Martin Murray
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 6.19. Position Limits for Cotton No. 2 Contracts

(a) Subject to the exceptions contained in this Chapter, the maximum net long or net short position which any one (1) Person may hold or control in the Cotton No. 2 Contract is five thousand (5,000) Futures Contracts and Futures Equivalent Contracts in all months combined and [~~two~~] three thousand five hundred (~~[2]~~3,500) Futures Contracts and Futures Equivalent Contracts in any one (1) month.

(b) Subject to the exceptions contained in this Chapter, the maximum net long or net short position which any one (1) Person may hold or control in the Cotton No. 2 Contract is three hundred (300) Futures Contracts for any month for which delivery notices have been or may be, issued.

(c) The establishment of position limits for Cotton No. 2 Contracts shall be deemed to affect the terms and conditions of the Cotton No. 2 Contract for purposes of By-Law Section 601(b)(i).

EXHIBIT A