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July 19, 2007

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

Re: Security Futures Products Rule Submission and Rule Certification

Dear Ms. Donovan:

On behalf of my client, OneChicago, LLC, and pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and section 41.24 of the regulations promulgated by the Commission under the Act, submitted herewith is a rule amendment to the OneChicago, LLC ("OneChicago") Rules 144, 404, 406 and 416 relating to the OneChicago System, Acceptable Orders, Execution of Orders by the OneChicago System and Exchange of Futures for Physical ("EFP") transactions, respectively, and conforming non-substantive amendments. These changes are being made in conjunction with the initiation of the OneChicago Block & EFP Trading System ("OneChicago BETS"), an electronic system which will permit authorized traders to trade and report block and Block Roll trades and provide a matching and reporting system for EFP transactions. OneChicago Rules 416 and 417 dealing with EFPs and block trades will apply to OneChicago BETS. Thus, each party to a block trade or Block Roll on OneChicago BETS must qualify as an "eligible contract participant" as such term is defined in Section 1a(12) of the Act.

The rule amendments will be effective on July 20, 2007.

There are no opposing views that are not incorporated into this rule amendment. This rule change has also been filed with the Securities and Exchange Commission.

On behalf of OneChicago, I hereby certify that that the amendment to the Reporting Procedures has been filed with Securities and Exchange Commission and complies with the Act and regulations promulgated thereunder.

Regards,

/s/ Madge M. Piro *

* Not Licensed in the District of Columbia. Licensed in Michigan and Illinois. Practice Limited to Federal Securities and Commodity Futures Law.

Attachment A

143 OneChicago BETS

The term “OneChicago BETS” means the OneChicago Block & EFP Trading System.

143 144 OneChicago System

The term “OneChicago System” means the electronic systems, except for OneChicago BETS, administered by or on behalf of the Exchange which perform the functions set out in the Rules of the Exchange, including controlling and recording trading through OneChicago Workstations. Trades entered (into) on the “OneChicago BETS” are trades outside of the “OneChicago System”.

144 145 OneChicago Workstation

The term “OneChicago Workstation” means any computer connected to the OneChicago System, whether directly (through the application program interface of CBOE or CME, a proprietary network, the internet or otherwise) or indirectly through systems operated by a Clearing Member, in each case for the purpose of trading Contracts.

146 147 Order

No Change

147 148 Owner

No Change

148 149 Owner-Appointed Director

No Change

149 150 Passwords

No Change

150 151 Percentage Interest

No Change

151 <u>152</u>	Person
	No Change
152 <u>153</u>	Probable Cause Committee
	No Change
153 <u>154</u>	Related Party
	No Change
154 <u>155</u>	Responsible Trader
	No Change
155 <u>156</u>	Rule of the Clearing Corporation
	No Change
156 <u>157</u>	Rule of the Exchange
	No Change
157 <u>158</u>	Single Stock Futures
	No Change
158 <u>159</u>	Specifications Supplement
	No Change
160 <u>161</u>	Stock Index Future
	No Change
161 <u>162</u>	Subject
	No Change
162 <u>163</u>	Trading Hours
	No Change
163 <u>164</u>	Voting Interest
	No Change

404. Acceptable Orders

At the discretion of the Exchange, any of the following types of Orders, as well as any other types that may be approved from time to time, may be entered into the OneChicago System or OneChicago BETS with respect to any Contract:

- (a) No Change
- (b) No Change
- (c) No Change
- (d) No Change
- (e) No Change
- (f) No Change

(g) Good-'til-Date. A "Good-'til-Date Order" is an order that, unless executed, remains in the OneChicago System for the number of hours, minutes and seconds specified, up to and including 24 hours as indicated on the Order by the Clearing Member, Exchange Member or Access Person who placed it or the Expiration Date of the Contract to which it relates, whichever occurs first.

~~(g)~~ (h) Spread Order. A "Spread Order" is an order to buy a stated number of Contracts and to sell the same number of other Contracts, in a form accommodated by the OneChicago System.

~~(h)~~ (i) Contingency Orders. A "Contingency Order" is a Market Order or Limit Order to buy or sell a stated number of Contracts that is contingent upon a condition being satisfied while the order remains in the OneChicago System.

- (i) No Change

(ii) Fill or Kill Order. A "Fill or Kill Order" is an order which is automatically cancelled unless executed in its entirety within a short period of time, or immediately on OneChicago BETS, after its receipt.

(iii) Immediate or Cancel Order. An "Immediate or Cancel Order" is a Market Order or Limit Order which is automatically cancelled unless executed in whole or in part within five seconds, or immediately on OneChicago BETS, after its receipt.

(iv) No Change

(v) No Change

406 Execution of Orders by OneChicago System

(a) *General.* At the discretion of the Exchange, any of the following base allocation methods shall apply to the execution of Orders (other than Spread Orders) for any Contract by the OneChicago System or OneChicago BETS:

(i) No Change

(ii) No Change

(b) No Change

(c) No Change

(d) No Change

(e) No Change

Off-Exchange Transactions

416. Exchange of Future for Physical

(a) No Change

(b) No Change

(c) No Change

(d) No Change

(e) No Change

(f) An Exchange Member or Access Person authorized by a Clearing Member, whose bid or offer for an Exchange of Future for Physical is matched to a counterparty by OneChicago BETS, is obligated to complete the transaction unless some other provision of these Rules provides otherwise.