

45-day Review Period
expiration on 9-15-03

Citrus Associates of the New York Cotton Exchange, Inc.
World Financial Center
One North End Avenue, 13th Floor
New York, New York 10282

BY FACSIMILE/US MAIL

03-30

July 31, 2003

Ms. Jean A. Webb
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 Citrus Rule 63(a)(1) -
Submission Pursuant to Section 5c(c)(2) of the Act and Regulation 40.4**

Dear Ms. Webb:

Pursuant to Section 5c(c)(2) of the Act and Regulation 40.4, the Citrus Associates of the New York Cotton Exchange, Inc. ("the Exchange") is requesting approval for amendments to Rule 63(a)(1), attached as Exhibit A.

Exchange Rule 63(a)(1)(a) currently states, in relevant part, "In addition, effective at the commencement of trading on the business day before the first calendar day of the expiring month, the maximum gross long and/or short position that any one person may hold in the spot month is 300 contracts." The impact of this provision is that any position for which no hedge exemption has been granted must be reduced to 300 contracts by the close of trading two business days before first notice day.

The imposition of the spot month position limit at the close of trading two days before first notice day is inconsistent with the imposition of similar limits in other products traded during notice periods on other U.S. futures markets. This inconsistency has resulted in an inordinate number of violations of the spot month limit, presumably because of a lack of familiarity by futures commission merchant staff with this type of limit. Each violation has been questioned by the CFTC.

The amendments to Rule 63(a)(1) change the effective date for the imposition of the spot month limit from two days before the first notice day to one day before the first notice day. This

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change is consistent with other futures products.

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

The Exchange's Board of Directors approved the additional amendments at its meeting on July 31, 2003. No opposing views were expressed by members or others with respect to the amendments. The amendments will become effective with the November 2003 expiration.

If you have any questions, please do not hesitate to contact me at 212-748-4084.

Sincerely,



Jill S. Fassler
Vice President
Associate General Counsel

Enc.

cc: David Van Wagner
CFTC, Division of Market Oversight
Frederick Linse
CFTC, Division of Market Oversight
Allen Cooper
CFTC, New York Regional Office

(In the text of the amendments below, additions are underlined.)

RULE 63 SPECULATIVE POSITION LIMITS

(a) Position Limits

(1) The limit on the maximum net long or net short position on a futures equivalent basis which any one person may hold or control under contracts for futures delivery of Frozen Concentrated Orange Juice ("FCOJ") or options thereon is:

(a) 1800 in any other month; and (b) 3000 in all months combined.

In addition, [~~effective at the commencement of trading on the business day before the first calendar day of the expiring month,~~] the maximum gross long and/or short position that any one person may hold or control [~~in the spot month~~] is 300 contracts for any month for which delivery notices have or may be issued.

[REMAINDER OF RULE UNCHANGED]

EXHIBIT A