

April 22, 2004

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

Reference File #2447.01
Non-Material Agricultural Rule Changes

Dear Ms. Webb:

Pursuant to Commission Regulation 40.4(b), the Chicago Board of Trade (CBOT[®]) hereby submits the following:

- **Amendments to Regulation 1081.01(3) per the attached text (additions underlined).**

The referenced amendments would allow for the acceptance of treasury securities as collateral for Corn and Soybean Shipping Certificates.

Currently, Regulation 1081.01(3) requires that regular Warehousemen and Shippers execute letters of credit (or obtain a bond), naming the Exchange as the beneficiary, for the collateral backing Corn and Soybean Shipping Certificates. Under the proposed amendments, Warehousemen and Shippers would have the additional option of collateralizing registered shipping certificates through the transfer of treasury securities to the Exchange.

The CBOT Registrar's Office would value each security at its market value less SEC haircuts specified in SEC Rule 15c3-1(c)(2)(vi), (vii) and (viii). On a daily basis, the market value of the treasury securities would be calculated and compared to the market value of the registered shipping certificates, and additional treasury securities would be required to be deposited under the same circumstances that would require an increase in the amount of a letter of credit.

The CBOT intends to implement these amendments no sooner than ten days after the Commission's receipt of this filing.

There were no opposing views among the CBOT Board of Directors 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

b042004

Additions underlined.

1081.01 Regularity of Warehouses and Issuers of Shipping Certificates

(3) The proprietor or manager of such warehouse or shipping station shall be in good financial standing and credit, and shall meet the minimum financial requirements and financial reporting requirements set forth in Appendix 4E. No warehouse or shipping station shall be declared regular until the person operating the same files a bond and/or designated letter of credit with sufficient sureties, or deposits with the Exchange, treasury securities, in such sum and subject to such conditions as the Exchange may require. Any such sums shall be reduced by SEC haircuts, as specified in SEC Rule 15c3-1(c)(2)(vi),(vii) and (viii). If the Warehouseman/Shipper deposits treasury securities with the Exchange, it must execute a security agreement on a form prescribed by the Exchange.