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September 9, 2004

Ms. Jean A. Webb
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

RE: Section 5c(c)(1), Part 40.6 - Rule Certification
for Delisting of S&P Topix 150 Futures.
CME Submission 04-85

Dear Ms. Webb:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commission per the exchange certification procedure, that the Exchange will delist the June 2005 S&P Topix 150 Index futures contract as well as all subsequent contracts. This action was approved by the Exchange's Board on September 8, 2004.

On August 20, 2004, the Tokyo Stock Exchange ("TSE") notified CME that they have decided to discontinue the S&P Topix 150 contract due to insufficient liquidity and lack of demand. Considering that its settlement price is derived by the TSE, we will follow suit.

TSE will discontinue their listings beginning with the June 2005 contract. CME currently lists two March quarterly contracts. The March 2005 S&P Topix 150 contract will be listed at CME on September 10, 2004. Subsequent to the March 2005 listing, no other contract months will be listed for trading.

The Exchange certifies that this action neither violates nor is inconsistent with any provision of the Commodity Exchange Act or of the rules thereunder.

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If you require any additional information regarding this action, please do not hesitate to contact Ms. Ariel Hantin, Senior Research Analyst at 312-559-4951 or via e-mail at ahantin@cme.com. Please reference our CME Submission #04-85 on all future correspondence regarding this notification.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Labuszewski". The signature is fluid and cursive, with a large initial "J" and "L".

John W. Labuszewski, Director
Research & Product Development

cc: Mr. Thomas M. Leahy and Mr. Steven B. Benton
CFTC Division of Market Oversight, Product Review & Analysis Section