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February 1, 2005

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

Re: Certification of decreased position limits for CME Rule 15102.E
CME Submission #05-12.

Dear Ms. Webb:

A decrease in the spot month position limits for CME Frozen Pork Bellies futures has been approved. The decreased limits will be effective for all newly listed contract months, beginning with the February 2006 contract upon its listing on February 24, 2005.

The text of amendments to Rule 15102.E, reflecting the schedule of decreased limits, are as follows, with additions underlined and deletions overstruck.

FROZEN PORK BELLIES FUTURES

15102.E. Position Limits

No person shall own or control more than:

- 1,000 contracts net long or short in all contract months combined;
- 800 contracts long or short in any contract month;
- ~~450~~ 100 contracts long or short in the expiring contract month as of the close of business on the first business day following the first Friday of the contract month;
- As of the close of business on the sixth business day following the first Friday of the contract month, no person shall own or control more than the number of contracts long or short in the expiring contract month as described in the list below:

Deliverable Supply	Position Limits
500 or more	400 <u>75</u> contracts
499 to 400	75 <u>50</u> contracts
399 or less	50 <u>25</u> contracts

For purposes of this rule, "Deliverable Supply" shall mean the number of registered deliverable pork bellies reported in the CME Clearing House Department's weekly report immediately preceding the first Friday of each expiring contract month.

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5. As of the close of business on the business day immediately preceding the last 3 days of trading, no person shall own or control more than the number of contracts long or short in the expiring contract month as described in the list below:

For the July and August contract months only:

Deliverable Supply	Position Limits
300 or more	50 <u>25</u> contracts
299 or less	25 <u>10</u> contracts

For all other contract months except July and August:

Deliverable Supply	Position Limits
200 or more	50 <u>25</u> contracts
199 or less	25 <u>10</u> contracts

For purposes of this rule, "Deliverable Supply" shall mean the number of registered deliverable pork bellies reported in the CME Clearing House Department's weekly report immediately following the first Friday of each expiring contract month.

For positions involving options on Frozen Pork Bellies futures contracts, this rule is superseded by the option speculative position limit rule.

CME certifies that the rule complies with the Commodity Exchange Act and regulations thereunder.

Please do not hesitate to contact Jack Cook at 312-930-3295 or jcook@cme.com if any questions arise. Please reference our CME Submission #05-12 on all correspondence for this.

Sincerely,



John W. Labuszewski, Director
Research & Product Development