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Chicago Mercantile Exchange

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October 27, 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 Interpretation to CME Futures Rules 20403.C and 20603.C pursuant to CFTC Regulation §40.6(a).
CME Submission #05-109.

Dear Ms. Webb:

On October 26, 2005 the Exchange approved adoption of the following rule interpretation:

Substitution for lowest published freight rate in Urea Futures Rule 20403.C-Seller's Duties and Urea Ammonium Nitrate (UAN) Futures Rule 20603.C-Seller's Duties:

If published freight rates from New Orleans Louisiana are not available, then published rates from Michoud Louisiana may be used to determine the lowest published freight rate to the buyer's destination.

The Exchange certifies that this interpretation complies with the Act and rules 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 #05-109 on all correspondence for this.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Cook", with a stylized flourish at the end.