



Lisa Dunsky
Executive Director and Associate General Counsel
Legal Department

August 22, 2012

VIA E-MAIL

Mr. Ananda Radhakrishnan
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581
aradhakrishnan@cftc.gov

RE: CME Submission 12-151

Dear Ananda,

This is to confirm that Chicago Mercantile Exchange Inc. (CME) agrees to the Commission's request for an extension until September 17, 2012 to review the above-reference rule submission. As you know, the submission was made pursuant to Commission Regulations 39.15(b)(2) and 40.5, and it relates to commingling of Interest Rate Swaps and certain related futures in the "Cleared Swaps Customer" origin. Adoption of CME's rules to implement this commingling program will allow the industry to make meaningful resource commitments to support the offering and achieve the known capital efficiencies across the relevant listed and OTC products. We would be happy to discuss the program further with you and your team as necessary to achieve that end.

Sincerely,

A handwritten signature in black ink that reads "Lisa A. Dunsky".

Lisa A. Dunsky
Executive Director and Associate General Counsel

cc: Phyllis Dietz (via e-mail)
John Lawton (via e-mail)
Shallom Moses (via e-mail)
Heidi Rauh (via e-mail)