



C.F.T.C.
OFFICE OF THE SECRETARIAT

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April 9, 2010

Mr. David Stawick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Security Futures Products Rule Submission and Rule Certification
Insourcing Surveillance and Compliance Responsibilities

Dear Mr. Stawick:

On behalf of OneChicago, LLC ("OCX" or "Exchange"), and pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and section 41.24 of the regulations promulgated by the Commission under the Act, we are advising the Commission of a change in our market surveillance and compliance responsibilities.

When the Exchange began operations in November 2002, the CME Group was engaged, pursuant to the Regulatory Services Agreement dated as of April 2, 2002, to provide "certain human and technical resources and related services to assist OCX on an ongoing basis in implementing" its surveillance, compliance and enforcement program (the "Compliance Program"). During the past year, OCX has made the decision, after almost nine years, to in source the Compliance Program, by, among other things, developing its own proprietary system known as Csystem™. The Commission's staff was made aware of this decision has been informed of our progress toward this goal.

Specifically, OCX certified, on December 22, 2009, changes to its Rules regarding Public Directors and the Regulatory Oversight Committee and to Chapter 7 - Discipline and Enforcement. Further, the Exchange certified changes to its Error Policy on March 26, 2010. These changes were consistent with the Exchange's insourcing strategy.

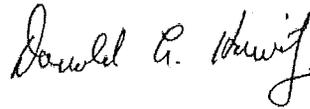
The Exchange has also sought staff's guidance throughout this process by responding to questions regarding our technological and physical capabilities and

submitting drafts of OCX's Surveillance Compliance Manual ("Manual"). With respect to the Manual, OCX has responded to questions from Staff and made the appropriate changes as requested. The Manual is now in its final form and is available to the Staff at their request.

Additionally, Staff will be making an on-site surveillance visit to the Exchange in May to view the Csystem in operation. Until such time as Staff has completed its review, and has no additional comments, the Csystem will not be used in live production.

On behalf of OCX, I hereby certify that the above representations comply with the Act and the regulations promulgated thereunder.

Sincerely,

A handwritten signature in cursive script, appearing to read "Donald L. Horwitz".

Donald L. Horwitz
Managing Director, General Counsel and
Chief Regulatory Officer