



"Improve the economic well-being of agriculture and enrich the quality of farm family life."

October 1, 2008

Mr. David Stawick, Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Dear Mr. Secretary:

On behalf of the over 70,000 farm families we represent, the Illinois Farm Bureau would like to submit comments in regards to the proposed amendments to the Chicago Board of Trade's wheat futures contract.

We appreciate efforts by the CME Group and the CFTC to attempt to alleviate the lack of convergence problem that has been occurring in CBOT corn, soybeans, and wheat contracts for the last several years. We view fixing this problem to be of utmost importance to our industry.

While we are not opposed to the proposed amendments that include increasing seasonal premium storage charges, adding delivery points in northwest Ohio, and lowering the allowable vomitoxin levels, we do not feel these steps are sufficient to adequately address the overall problem. The proposed changes will not go into effect until July 2009 and do not address the problem in the corn and soybean futures markets whatsoever.

Producers, grain elevators, and other market participants have already suffered through lack of convergence issues for several years. By the time these proposed changes are implemented in the wheat contract and then studied for a length of time to evaluate the effectiveness before possibly implementing similar steps in corn and soybean contracts indicates corn and soybean market participants may not see any substantial progress for a number of years. We find this unacceptable.

We strongly encourage the CFTC to require more comprehensive steps to address the lack of convergence issue, along with the swaps loophole, added surveillance of index funds and OTC activity and hedge exemptions to market participants not actively involved engaged in either side of the cash commodity.

Thank you for your consideration.

Sincerely,

ILLINOIS FARM BUREAU®

Philip Nelson
President



ILLINOIS AGRICULTURAL ASSOCIATION®

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