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Via Electronic Mail

January 12, 2010

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

SUBJECT: Request for Commission Approval

Dear Mr. Stawick:

Pursuant to Commodity Exchange Act Section 5c(c) and Commodity Futures Trading Commission ("Commission") Regulation 40.5(a), the Minneapolis Grain Exchange ("MGEX") respectfully requests Commission approval of the attached amended Regulations. Additions have been underlined.

The purpose for amending MGEX Regulations 2013.00. and 2013.01. is to increase the speculative position limits for the Soft Red Winter Wheat Index contracts. Trading activity and requests by market participants demonstrate the need and interest for increasing the limits. The proposed increase will provide users of the contract to be able to effectively arbitrage MGEX positions against other markets.

Pursuant to the authority of MGEX Rule 210.01., the Board of Directors unanimously approved amending the Regulations. The changes are to be effective immediately upon Commission approval. If there are any questions regarding this submission, please contact me at (612) 321-7169. Thank you for your attention to this matter.

Sincerely,

Taym S.

Layne G. Carlson Corporate Secretary

Enclosure cc: Thomas J. Bloom Anne Reuter

> 130 Grain Exchange Building 400 South 4th Street Minneapolis, MN 55415-1413 mgex@mgex.com 800.827.4746 612.321.7101 Fax: 612.321.7196 equal opportunity employer

### 2013.00. FUTURES POSITION LIMITS.

### E. Soft Red Winter Wheat Index. Pursuant to the provisions of Rule 7908.00., the Board of Directors has adopted this Regulation.

No individual or entity shall own or control in excess of five-thousand (5,000) contracts net long or short in the settlement month (except during the last five trading days when the limit shall be two-thousand seven-hundred fifty (2,750) contracts net long or short), five-thousand (5,000) contracts net long or short in any single month, or six-thousand five-hundred (6,500) contracts net long or short in all contract months combined.

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#### 2013.01. OPTIONS POSITION LIMITS.

## E. Soft Red Winter Wheat Index. Pursuant to the provisions of Rule 8012.00., the Board of Directors has adopted this Regulation.

No individual or entity shall own or control a combination of Options and underlying Futures Contracts that exceeds six-thousand five-hundred (6,500) futures-equivalent contracts net long or short in all contract months combined, five-thousand (5,000) futures-equivalent contracts net long or short in any single contract month, or five-thousand (5,000) futures-equivalent contracts net long or short in the settlement month (except during the last five trading days when the limit shall be two-thousand seven-hundred fifty (2,750) futures-equivalent contracts net long or short).

For the purpose of this Regulation, a long call option, a short put option and a long underlying Futures Contract are on the long side of the market; similarly, a short call option, a long put option and a short underlying Futures Contract are on the short side of the market.