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OFFICE OF THE SECRETARIAT

January 16, 2009

Mr. David Stawick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

**Re: Regulation §40.5. Request for Commission Rule Approval of
Amendments to CME Rules 10202. and 102A01.
CME Submission No. 09-008R**

Dear Mr. Stawick,

I. SUBMISSION

In accordance with Regulation §40.4, Chicago Mercantile Exchange Group ("Exchange") hereby requests review and approval, under the provisions of Regulation §40.5, of amendments to CME Feeder Cattle futures Rule 10202.E and options on CME Feeder Cattle futures Rule 102A01.F.

II. TEXT OF PROPOSED RULE CHANGES

The text of the proposed rule amendments is given below. Deletions are overstruck, additions are underlined.

FEEDER CATTLE FUTURES

10202. FUTURES CALL

E. Position Limits

No person shall own or control more than:

1. ~~4,500~~ 1,600 contracts long or short in any contract month;
2. 300 contracts long or short in the spot month during the last ten days of trading.

For positions involving options on Feeder Cattle futures, this rule is superseded by the option speculative position limit rule.

OPTIONS ON FEEDER CATTLE FUTURES

102A01. OPTION CHARACTERISTICS

F. Position Limits

No person shall own or control a combination of options and underlying futures that exceeds:

1. ~~4,500~~ 1,600 futures equivalent contracts net on the same side of the market in any contract month;

2. 300 futures equivalent contracts net on the same side of the market in the spot month during the last ten days of trading.

For the purpose of this rule, the futures equivalent of an option contract is 1 times the previous business day's IOM risk factor for the option series. Also for purposes of this rule, a long call option, a short put option, and along underlying futures contract are on the same side of the market; similarly, a short call option, a long put option, and a short underlying futures contract are on the same side of the market.

In addition, the CME Position Limit and Reportable Level Table in the Interpretations & Special Notices Relating to Chapter 5 section of the CME Rulebook is amended to reflect these amendments. The pertinent section of the Table is attached, with additions underlined and deletions overstruck.

III. EFFECTIVE DATE AND RULE PROMULGATING AUTHORITY

The Exchange, pursuant to Rule 230.j., approved these proposed amendments on January 14, 2009. The amendments will become effective for all contract months after Commission approval.

IV. OPERATION, PURPOSE AND EFFECT OF THE PROPOSED AMENDMENTS

The amendments increase the speculative position limits of Feeder Cattle futures and options for non-spot contract months.

The increase for non-spot contract months is based on the increased levels of open interest in 2008. The level of 1600 contracts was arrived at using a formula established by Regulation §150.5(c)(2). The data used in the calculation has been sent electronically to the Commission's staff for review.

V. OPPOSING VIEWS

There were no substantive opposing views to the proposed amendments.

VI. APPLICATION OF THE ACT AND REGULATIONS

There does not appear to be any need for amendment or interpretation of the Act and Regulations in order to approve the proposed amendments.

VII. CONFIDENTIAL TREATMENT

Confidential treatment is not requested for this submission.

If you require any additional information regarding this submission, please do not hesitate to contact Jack Cook at 312-930-3295 or via e-mail at jack.cook@cmegroup.com or me at 312-648-5422. Please reference CME Submission No. 09-008R in any related correspondence.

Sincerely,

/s/ Stephen M. Szarmack
Director and Associate General Counsel

POSITION LIMIT AND REPORTABLE LEVEL TABLE

CONTRACT NAME	Options	SCALE-DOWN SPOT MONTH (1)	SCALE-DOWN SPOT MONTH (2)	SPOT MONTH	SINGLE MONTH	ALL MONTHS COMBINED	POSITION ACCOUNT-ABILITY	REPORTABLE FUT LEVEL	REPORTABLE OPT LEVEL
CME Commodities									
Butter	Y	50		150	*900	*1,000		25	25
Cash-Settled Butter	Y			100	*500			25	25
Class III Milk	Y				*1,500			25	25
Class IV Milk	Y			250	*1,000			25	25
Dry Whey	Y			200	*1,000			25	25
Feeder Cattle	Y			300	*1,500 *1,600			25	25
Frozen Pork Bellies	Y	*(A) 75 or 50 or 25	*(B) 25 or 10	100	*800	*1,000		5	5
Goldman Sachs Commodity Index	Y					*10,000		25	25
Goldman Sachs ER Index						*10,000		25	
Lean Hogs	Y			950	*4,100			25	25
Live Cattle	Y	300		450	*5,400			25	25
Random Length Lumber	Y			435	*1,000			25	25
Nonfat Dry Milk	Y			100	*1,000			25	25
Northern Bleached Softwood KP	Y				*1,000			25	25
Bleached Hardwood Kraft Pulp	Y				*1,000			25	25
<p>*(A) The scale-Down levels in the spot month depends on "Deliverable Supply" shall mean the number of registered deliverable pork bellies reported to the CME Clearing House Department's weekly report immediately <i>preceding</i> the first Friday of each expiring contract.</p> <p>*(B) The scale-Down levels in the spot month depends on "Deliverable Supply" shall mean the number of registered deliverable pork bellies reported to the CME Clearing House Department's weekly report immediately <i>following</i> the first Friday of each expiring contract.</p> <p>*Net futures equivalents (NFE) long or short.</p>									