# OneChicagov 

141 West Jackson, Suite 1065 Chicago, lllinois 60604

January 20, 2011
Mr. David Stawick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

## Re: Revision to Schedule A Chapter 4 Regarding Position Limit Amounts

Dear Mr. Stawick:

OneChicago, LLC ("OneChicago") hereby submits a Revision to Schedule A Chapter 4 regarding Position Limit Amounts as set forth in OCX Rule 414.- The attached schedule removes and replaces product rule certifications previously filed with the Commodity Futures Trading Commission ("Commission") with respect to those products eligible for increased position limits or position accountability.

The table below summarizes the differences between the existing and the revised schedule. The change will become effective upon filing.
"Schedule A to Chapter 4"

| Previous Total | 68 |
| :--- | :--- |
| Removed Securities | 28 |
| Added Securities | 3 |
| Lowered Position Limits | 8 |
| Increased Position Limits | 2 |
| Remained consistent | 30 |
| New Total | $\underline{43}$ |

On behalf of OneChicago, I hereby certify that the products identified in the table above to OneChicago Rule 905, as modified in this letter, comply with the conditions for trading set forth in Section 41.25 of the regulations promulgated by the Commission under the Commodity Exchange Act ("Act"), and complies with the Act and the regulations thereunder.

If you have any questions or concerns please contact Shahe Alexanian at 312-424-8522.
/s/ Donald L. Horwitz
Managing Director and
General Counsel
OneChicago, LLC

Schedule A to Chapter 4*

| Row | Symbol | Security Name | Futures Symbol | Position <br> Limit** | Position Accountability*** | Unit / Multiplier |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | AA | Alcoa Inc. | AA1C AA1D |  | 22,500 | 100 |
| 2 | AAPL | Apple Computer Inc. | AAPL1C <br> AAPL1D | 22,500 |  | 100 |
| 3 | AMD | Advanced Micro Devices, Inc. | AMD1C <br> AMD1D |  | 22,500 | 100 |
| 4 | BAC | Bank Of America Corp | BAC1C <br> BAC1D |  | 22,500 | 100 |
| 5 | C | Citigroup, Inc. | $\begin{aligned} & \mathrm{C1C} \\ & \mathrm{C} 1 \mathrm{D} \end{aligned}$ |  | 22,500 | 100 |
| 6 | CIT | CIT Group Inc/New | CIT1C |  | 22,500 | 100 |
| 7 | CMCSA | Comcast Corporation Class A | CMCX1C <br> CMCX1D | 22,500 |  | 100 |
| 8 | CSCO | Cisco Systems, Inc. | $\begin{aligned} & \text { CSCO1C } \\ & \text { CSCO1D } \end{aligned}$ |  | 22,500 | 100 |
| 9 | DELL | Dell Inc. | DELL1C <br> DELL1D | 22,500 |  | 100 |
| 10 | EMC | EMC Corporation | EMC1C <br> EMC1D |  | 22,500 | 100 |
| 11 | F | Ford Motor Company | $\begin{aligned} & \text { F1C } \\ & \text { F1D } \end{aligned}$ |  | 22,500 | 100 |
| 12 | GE | General Electric Company | $\begin{aligned} & \text { GE1C } \\ & \text { GE5C } \\ & \text { GE6C } \\ & \text { GE7C } \\ & \text { GE8C } \\ & \text { GE1D } \end{aligned}$ |  | 22,500 | 100 |
| 13 | HPQ | Hewlett-Packard Company | HPQ1C HPQ1D | 22,500 |  | 100 |
| 14 | INTC | Intel Corporation | INTC1C <br> INTC1D |  | 22,500 | 100 |
| 15 | JPM | J.P. Morgan Chase Co. | JPM1C JPM1D |  | 22,500 | 100 |
| 16 | LVS | Las Vegas Sands Corp. | $\begin{aligned} & \text { LVS1C } \\ & \text { LVS1D } \end{aligned}$ |  | 22,500 | 100 |
| 17 | MGM | MGM MIRAGE | MGM1C <br> MGM1D |  | 22,500 | 100 |
| 18 | MSFT | Microsoft Corporation | MSFT1C <br> MSFT1D |  | 22,500 | 100 |
| 19 | MU | Micron Technology Inc. | MU1C <br> MU1D |  | 22,500 | 100 |
| 20 | NOK | Nokia Corporation ADR | NOK1C <br> NOK1D | 22,500 |  | 100 |
| 21 | NVDA | Nvidia Corporation | NVDA1C NVDA1D | 22,500 |  | 100 |
| 22 | ORCL | Oracle Corporation | ORCL1C |  | 22,500 | 100 |


|  |  |  | ORCL1D |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 23 | PFE | Pfizer | PFEIC PFE1D |  | 22,500 | 100 |
| 24 | Q | Qwest Communications International Inc. | Q1C |  | 22,500 | 100 |
| 25 | RF | Regions Financial Corporation | $\begin{aligned} & \text { RF1C } \\ & \text { RF1D } \end{aligned}$ | 22,500 |  | 100 |
| 26 | S | Sprint-Nextel | $\begin{aligned} & \mathrm{S} 1 \mathrm{C} \\ & \mathrm{~S} 1 \mathrm{D} \end{aligned}$ |  | 22,500 | 100 |
| 27 | T | AT\&T Corporation | $\begin{aligned} & \text { T1C } \\ & \text { T1D } \end{aligned}$ |  | 22,500 | 100 |
| 28 | Vale | Vale S.A. | VALE1C | 22,500 |  | 100 |
| 29 | WFC | WELLS FARGO \& CO. | WFC1C <br> WFC1D |  | 22,500 | 100 |
| 30 | XOM | Exxon Mobil Corporation | XOM1C <br> XOM1D | 22,500 |  | 100 |
| 31 | YHOO | Yahoo!, Inc. | YHOO1C <br> YHOO1D |  | 22,500 | 100 |
| Exchange Traded Funds |  |  |  |  |  |  |
| 1 | EEM | iShares MSCI Emerging Markets Index | EEM1C |  | 22,500 | 100 |
| 2 | EFA | iShares MSCI EAFE Index Fund | EFA1C | 22,500 |  | 100 |
| 3 | EWJ | iShares MSCI Japan Index Fund | EWJ1C | 22,500 |  | 100 |
| 4 | FAS | Direxion Financial Bull 3 X Shares | FAS1C |  | 22,500 | 100 |
| 5 | FAZ | Direxion Financial Bear 3X Shares | FAZ1C |  | 22,500 | 100 |
| 6 | IWM | iShares Russell 2000 Index Fund | IWMM1C IWMM1D |  | 22,500 | 100 |
|  |  |  | IWM1C IWM1D |  | 2,250 | 1,000 |
| 7 | QQQQ | PowerShares QQQ | QQQM1C |  | 22,500 | 100 |
|  |  |  | QQQQ1C |  | 2,250 | 1,000 |
| 8 | \|SDS | ProShares UltraShort S\&P 500 | SDS1C |  | 22,500 | 100 |
| 9 | SPY | SPDR S\&P 500 ETF Trust | SPYM1C <br> SPYM1D |  | 22,500 | 100 |
|  |  |  | $\begin{aligned} & \text { SPY1C } \\ & \text { SPY1D } \end{aligned}$ |  | 2,250 | 1,000 |
| 10 | TZA | Direxion Daily Small Cap Bear 3x Shares | TZA1C | 22,500 |  | 100 |
| 11 | UNG | United States Natural Gas Fund LP | UNG1C <br> UNG1D | 22,500 |  | 100 |
| 12 | XLF | Financial Select Sector SPDR | XLFM1C <br> XLFM1D |  | 22,500 | 100 |
|  |  |  | XLF1C |  | 2,250 | 1,000 |
|  |  | *Positions are aggregated for all classes for the same underlying security |  |  |  |  |

**Generally, the position limits for single stock futures are no greater than 13,500 contracts net long or short during the last five trading days of an expiring contract month. The products listed here qualify for higher position/accountability limits. See, OCX Rule 414.
***Position Accountability Rule 414(g): The Exchange has adopted this position accountability rule for security futures products where the average daily trading volume in the underlying security exceeds 20 million shares and there are more than 40 million shares of the underlying security outstanding. A Person owning or controlling more than a specified number of futures contracts net long or short in all contract months combined, as set forth in this Schedule A, must provide, in a timely fashion, upon request by the Exchange:
a) Information regarding the nature of the position
b) Trading strategy
c) Hedging information if applicable, and consent to halt increasing their positions when so ordered by the Exchange
Securities that are not included in the above table are those:
a) With a multiplier of 100 , the position limit $=13,500$
b) With a multiplier of 1000 , the position limit $=1,350$

