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January 22, 2008

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

**RE: CBOT U.S. Treasury Options Electronic Market Making Program, CBOT
Submission No. 08-11.**

Dear Mr. Stawick:

The Chicago Board of Trade (CBOT) hereby notifies the Commission that it has approved a market making program in the CBOT U.S. Treasury Options contracts.

CBOT certifies that this program complies with the Commodity Exchange Act and the regulations thereunder.

If you have any questions regarding this matter, please call me at (312) 648-5422.

Sincerely,

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



U.S. Treasury Options Electronic Market Maker Program

PRODUCTS

- 2-Year Treasury Note options
- 5-Year Treasury Note options
- 10-Year Treasury Note options
- 30-Year Treasury Note options

ELIGIBILITY

- Market makers must be a Chicago Board of Trade individual, equity, trading or e-cbot® member.
- An average of 12 Market Makers will be allowed in each product and each time period.

HOURS

- Extended and Regular Trading Hours (ETH and RTH).

MARKET MAKER OBLIGATIONS

Obligations for Allocation Consideration and Rankings

- All market makers must respond to 70 percent of all Requests for Quotes (RFQs) regardless of contract, month or strike.
- Treasury option market makers must stream quotes in ATM Straddles, ATM Calls and ATM Puts, and the four Calls and Puts to nearest ATM. The first two serial and the first two quarterly months will be reviewed.
- Market makers will be ranked on a quarterly basis with benefits going into effect the next month.

Tentative Evaluation and Allocation Periods

Evaluation Period For	Allocation Effective Date
March 16, 2008 – June 15, 2008	July 1, 2008 – September 30, 2008
June 16, 2008 – September 15, 2008	October 1, 2008 – December 31, 2008
September 16, 2008 – December 15, 2008	January 1, 2009 – March 31, 2009*

*Contingent upon extension of Market Maker program after 2008

Tentative Scoring for Allocation Consideration and Rankings

- ETH market makers will be evaluated on their ETH performance.

- RTH market makers will be evaluated on both their RTH and ETH performance, regardless of official participation in the ETH program.

OVERVIEW OF MARKET MAKER PROGRAM

Start Date is Sunday, January 27, 2008

End Date is Wednesday, December 31, 2008

Monitoring and Termination of Status

- CME Group will monitor market making activity on an ongoing basis, and retains the right to revoke market making status if CME Group concludes from its review that a program participant is not complying with the market-making obligations of the program.

Program Time Line

- **CBOT Globex Launch – January 27, 2008 through March 15, 2008:** All market makers will be ranked and given frequent updates when possible. This period will be used for the market makers to become comfortable with the new platform and develop their systems. These rankings will **not** be counted towards allocations.
- **March 16, 2008 through June 15, 2008:** All market makers will be ranked and sent weekly updates. These rankings will be real and final results will be applied towards allocations.
- **June 1, 2008:** Flow allocations will begin in both RTH and ETH programs. These allocations will be good through September 30, 2008.

Questions about the Program

- Please contact, David Reif, Associate Director, CME Group Interest Rate Products at (312) 648-3839.