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February 15, 2008

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

OFFICE OF THE SECRETARY

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C.F.T.C.

RE: Section 5c(c)(1), Part 40.6 – Amendments to Chapters 359A, Options on E-Mini Nasdaq® 100 futures contracts. CME Submission# 07-94.

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commission of amendments to the options on E-Mini Nasdaq 100 futures contracts. The Exchange certifies that this action neither violates nor is inconsistent with any provision of the Commodity Exchange Act or of the rules thereunder.

The Exchange hereby amends the strike listing rule for the E-Mini Nasdaq 100 options contracts to streamline the product offering. Currently, the E-Mini Nasdaq 100 options contract strike listing rules allow a 7.5 percent of the "at-the-money" range with 10 index point intervals.

Under the amended listing rules for E-Mini Nasdaq 100 options, additional strikes will be listed in 25-point increments within a range of 15 percent of the "at-the-money" strike. The table below illustrates the changes for each options contract with the amended rules following.

Strike Interval	Current	As Amended
25 points	Not Applicable	Within 15 percent of the At-The-Money strike

Please note that the amended rule applies to all contract months, including those months that have already been listed. The text of Rule amendments are as follows, with additions underlined. Due to an inadvertent administrative issue associated with the filing of the original submission, the amended strike listing procedure is retroactive to Sunday, November 18, 2007, following the expiration of the November 2007 contracts.

If you require any additional information regarding this action, please do not hesitate to contact Ms. Lucy Wang, Research Analyst at 312-648-5478 or via e-mail at

**Mr. Stawick**  
**February 15, 2008**  
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lucy.wang@cmegroup.com. Please reference our CME Submission #07-94 on all future correspondence regarding this notification.

Sincerely,

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

cc: Mr. Thomas M. Leahy and Mr. Steven B. Benton  
CFTC Division of Market Oversight, Product Review & Analysis Section

**Text of Rule Amendments**

(Additions are underlined, deletions are bracketed and overstruck.)

**CHAPTER 359A  
Options on E-mini NASDAQ 100 Index® Futures**

**359A01.E. Exercise Prices**

1. Options in the March Quarterly Cycle

~~[On or Before June 15, 2007]~~

~~The exercise price shall be stated in terms of the E-Mini Nasdaq 100 Index futures contract. At the commencement of trading, the Exchange shall list all exercise prices that are integers divisible by 25 without remainder, e.g. 2000, 2025, 2050, etc, in a range of 100 index points above and below the previous day's settlement price of the E-Mini Nasdaq 100 Index futures contract.~~

~~The exercise price on the second nearest contract month, the Exchange shall add exercise prices at an interval that is an integer divisible by 5 without remainder in a range of 100 index points above and below the previous day's settlement price of the underlying futures contract.~~

~~On or After June 17, 2007]~~

A referencing index shall be determined each quarter on the day prior to the expiration of the March Quarterly futures contract and shall equal the daily settlement price of the nearest expiring NASDAQ 100 index futures contract. The chosen referencing index will then be used to determine the strike listing range for all listed contracts. The index points are rounded to the nearest integer.

At the commencement of trading, the Exchange shall list all exercise prices that are integers divisible by 10 without remainder in a range of 7.5 percent of the referencing index above and below the previous day's settlement price of the underlying futures contract and divisible by 25 without remainder in a range of 15 percent of the referencing index above and below the previous day's settlement price of the underlying futures contract.

Thereafter, when a daily settlement price in the underlying futures contract occurs at, or passes through, any exercise price, the Exchange shall list, on the next trading day, all eligible exercise prices in the corresponding ranges.

Exchange Staff, under delegated authority from the Board may modify the provisions governing the establishment of exercise prices as it deems appropriate.

2. Options not in the March Quarterly Cycle

Exercise prices for options not in the March quarterly cycle listed for trading shall be identical to the exercise prices that are listed for the March quarterly options on the same underlying futures contract. For example, the exercise prices listed for the January contract shall be identical to those listed for the March contract.

(End of rule amendments)

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At the commencement of trading, the Exchange shall list all exercise prices that are integers divisible by 10 without remainder in a range of 7.5 percent of the referencing index above and below the previous day's settlement price of the underlying futures contract and divisible by 25 without remainder in a range of 15 percent of the referencing index above and below the previous day's settlement price of the underlying futures contract.

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