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OFFICE OF THE SECRETARY/T

February 27, 2009

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

**RE: CBOT Rule 855 ("Offsetting Mini-Sized and Full-Sized Futures
Positions")
CBOT Submission No. 09-034**

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT") hereby notifies the Commission that it has adopted amendments to Rule 855 ("Offsetting Mini-Sized and Full-Sized Futures Positions") to clarify that the CME Clearing House will accept a clearing member's request to offset mini-sized Corn, Soybeans and Wheat futures with full-sized Corn, Soybean and Wheat futures provided that it receives an opposite offset request for another account with different beneficial ownership. The former language inaccurately indicated that such requests would be accepted if the CME Clearing House received an opposite offset request from another clearing member.

The text of the rule amendments appears on the next page, with additions underscored and deletions overstruck.

CBOT certifies that these changes comply with the Commodity Exchange Act and regulations thereunder.

If you have any questions regarding this matter, please contact Robert Sniegowski, Associate Director, Market Regulation Department, at 312.341.5991 or me at 312.648.5422. Please reference CBOT Submission No. 09-034 in any related correspondence.

Sincerely,

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

855.

OFFSETTING MINI-SIZED AND FULL-SIZED FUTURES POSITIONS

[Section A. is unchanged.]

- B. Physically delivered futures contracts - With the consent of the account controller, a clearing member may request to offset and liquidate long mini-sized futures positions against short full-sized futures positions, or short mini-sized futures positions against long full-sized futures positions, held in the same account in the following ratios of mini-sized to full-sized futures contracts:

Mini-sized (1000 bu.) Corn to Full-sized (5000 bu.) Corn 5:1

Mini-sized (1000 bu.) Soybean to Full-sized (5000 bu.) Soybean 5:1

Mini-sized (1000 bu.) Wheat to Full-sized (5000 bu.) Wheat 5:1

The clearing member shall notify the Clearing House of its request to offset positions by submitting reports to the Clearing House in such form and manner as the Clearing House shall specify. If accepted, the positions being offset shall be transferred to a holding account at the Clearing House. The Clearing House shall accept such request or fraction of such request upon receiving an opposite offset request for another account with different beneficial ownership from another clearing member. ~~Allowable~~Such requests shall be processed in the order of oldest request date first.

No such offset requests pursuant to this Section shall be accepted for any accounts during the last two trading days.