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April 2, 2008

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

RE: CME & CBOT Market Regulation Advisory Notice RA0806-3;
CME & CBOT Market Regulation Advisory Notice RA0807-3; and,
CME & CBOT Market Regulation Advisory Notice RA0808-3
CME & CBOT Submission No. 08-65

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME") and The Board of Trade of the City of Chicago, Inc. ("CBOT") (collectively, "the Exchanges") hereby notify the Commission that the Exchanges have issued the following Market Regulation Advisory Notices: CME & CBOT RA0806-3 ("Computerized Trade Reconstruction ("CTR") Clearing Member Back Office Audit Enforcement Program"), CME & CBOT RA0807-3 ("Order Entry on the Consolidated Trading Floor") and CME & CBOT RA0808-3 ("Trading Consolidation Rule Changes"). Copies of these Notices are attached.

CME and CBOT certify that these Notices neither violate nor are inconsistent with any provision of the Commodity Exchange Act or of the rules and regulations thereunder.

If you have any questions regarding either Notice, please contact Robert Sniegowski, Associate Director, Market Regulation Department, at 312.648.5493 or me at 312.648.5422.

Sincerely,

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

MARKET REGULATION ADVISORY NOTICE

Exchange	CME & CBOT
Subject	Computerized Trade Reconstruction ("CTR") Clearing Member Back Office Audit Enforcement Program Programs
Rule References	Rule 536
Advisory Date	March 26, 2008
Advisory Number	CME & CBOT – RA0806-3
Effective Date	April 1, 2008

Effective April 1, 2008, the CTR rules and enforcement program of CME and CBOT related to CTR Clearing Member Back Office Audits will be fully harmonized. The Section of Rule 536.F. concerning this program is presented below and is followed by an FAQ that addresses questions about the program.

536.F. CTR Clearing Member Back Office Audit Enforcement Program

The Market Regulation Department will conduct audits of clearing members to verify that required audit trail information has been accurately recorded and submitted. The CTR audit threshold level for firms failing to pick up and timestamp sequenced cards, verbal order cards and floor orders is 20%. The threshold for all other firm audit trail or recordkeeping deficiencies is 10%.

Percentage calculations will be made based on an examination of a combination of sequenced cards, verbal orders and floor orders totaling 150 documents. The number of documents containing a deficiency(ies) will be divided by the total number of documents examined in determining the deficiency percentage.

Violations of each threshold within 24 months shall be subject to automatic fines in accordance with the following schedule:

First occurrence	\$2,500
Second occurrence	\$5,000
Subsequent occurrence(s)	\$10,000

A firm will have 15 days after receipt of a fine to present evidence to the Market Regulation Department in support of having the fine dismissed. If the firm does not submit such evidence, or if the Market Regulation Department determines that the evidence submitted is insufficient to reduce the percentage below the threshold level, the fine shall be final and may not be appealed.

Notwithstanding the provisions of this Section, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Probable Cause Committee.

Questions regarding this Advisory should be directed to the following individuals in Market Regulation:

Lou Abarcar, Associate Director	312.648.3623
Terry Quinn, Manager	312.435.3753
Dave Peloquin, Experienced Data Quality Analyst	312.648.5415
Mike Forde, Experienced Data Quality Analyst	312.341.700

**FAQ Related to CME and CBOT 536.F.
CTR Clearing Member Back Office Audit Enforcement Program**

Q1: How often will clearing firms be audited?

A1: Each firm will be audited at least once every 12 months. A firm that is fined as a result of deficiencies identified in a back office audit will be audited a second time within the same 12 month period.

Q2: How will the back office audit be conducted?

A2: Staff of the Market Regulation Department will conduct the audit. If the firm is both a CME and CBOT clearing firm, both back office audits will be conducted at the same time, and if a clearing firm has multiple divisions, all divisions will also be audited at the same time. A minimum of 150 documents covering at least a two-day period will be reviewed for each Exchange's audit. Upon completion of a joint CME and CBOT audit, the clearing firm will receive separate reports detailing the results of the CME audit and the CBOT audit.

Q3: How will the error percentage be calculated for the "Data Entry Errors" portion of the audit?

A3: The percentage will be based on the total number of identified keypunch errors divided by the total number of documents examined. A document which contains multiple keypunch errors will be counted as one error for purposes of calculating the data entry error percentage.

Q4: How will the error percentage be calculated for the "Collection Deadline" portion of the audit?

A4: The percentage will be based on the total number of documents which are determined to have been collected late divided by the total number of documents examined.

Q5: Who issues the fines pursuant to the CTR back office audit fine schedule?

A5: The fines are issued by the Market Regulation Department.

Q6: May a CTR fine be appealed?

A6: A firm will have 15 days after receiving notice of an automatic fine to present evidence to the Market Regulation Department to have the fine rescinded and the violation dismissed. The Market Regulation Department will determine if such evidence is sufficient to reduce the error percentage below the threshold level. The decisions of the Market Regulation Department are final.

Q7: If a clearing firm violates exception thresholds at both CME and CBOT, will the clearing firm be sanctioned by each exchange?

A7: Yes. CME and CBOT are separate self-regulatory organizations and activity on each exchange will be evaluated separately. Accordingly, a firm that violates the thresholds on both exchanges will be separately sanctioned pursuant to the fine schedule by each exchange.

MARKET REGULATION ADVISORY NOTICE

Exchange	CME & CBOT
Subject	Order Entry on the Consolidated Trading Floor
Rule References	Rule 536
Advisory Date	April 1, 2008
Advisory Number	CME & CBOT – RA0807-3
Effective Dates	April 7, 2008 – CME Equity Complex Members & All CBOT Members April 28, 2008 – CME FX and Interest Rate Complex Members May 19, 2008 – CME Commodity Complex Members

The CBOT and CME policies applicable to order entry on the trading floor are being substantially harmonized as the transition to a consolidated trading floor takes place. The new policies will become effective on April 7 for the CBOT and for the CME Equity complex. The policies will take effect in the CME FX and Interest Rate complexes on April 28, and will take effect in the CME Commodity complex on May 19, concurrent with the relocation of those trading pits to the consolidated trading floor.

On-Floor Member Access to CME and CBOT Products Trading Electronically

Members will be permitted to enter orders for their own accounts (including accounts they control or in which they have an ownership or financial interest) in any electronically-traded product of either exchange via any approved electronic device while on the combined trading floor. This policy is consistent with current CBOT policy and eliminates the CME policy that prohibited members of the IMM, IOM and GEM Divisions from using a Galax-C device to access products of a higher division. The new policy allows members open electronic access from the trading floor in all CME and CBOT products trading electronically.

However, the existing CME restriction prohibiting top step brokers in the Standard & Poor's 500 Stock Price Index futures and Nasdaq 100 Index futures from operating Galax-C devices will remain in effect until after trading floor consolidation has been completed, at which time the policy will be reviewed.

Non-member fees will apply to trading in 1) products of a member's home exchange which are outside the scope of the member's division or series and 2) any cross-exchange product other than products included in the Expanded-Access Product ("EAP") program. This policy does not modify the existing prohibition on members who also hold a broker assistant badge from trading or carrying in their accounts any positions in contracts traded on their home exchange which are outside the scope of their membership division or series.

Members wishing to have their Galax-C units reprogrammed to permit access to other products must submit a request form to the Technology Support Desk at either of the following locations:

CME: 5th Floor, South Tower. Ph: 312.338.2665. Fax: 312.930.3275
CBOT: 4th Floor, off the financial room. Ph: 312.435.7141. Fax 312.435.3510

On-Floor Non-Member Access to CME and CBOT Products Trading Electronically

A non-member employee of a member or member firm is permitted to enter non-discretionary orders from the trading floor in any electronically-traded product for the account of his employer. Additionally, a non-member employee may enter non-discretionary orders from the trading floor for an account other than his employer's account, but only in products consistent with his employer's solicitation privileges (see SER S-4665, dated January 30, 2008, regarding solicitation privileges). In the case of CME, the relevant employer may be an approved execution operation.

However, in order to minimize disruption during the transition to the consolidated trading floor, and consistent with current CME policy, CME non-member employees are prohibited from entering orders into Galax-C devices. This distinction between CME and CBOT in the permitted use of Galax-C devices by non-member employees will be reviewed following completion of the trading floor consolidation.

Congestion within or outside a pit may preclude non-member employee access to certain locations, and members and member firms are required to comply with the decisions of the Pit Committees and Exchange staff in this regard.

On-Floor Member Access to CME and CBOT Products Trading via Open Outcry

Members will be permitted to enter written or verbal orders for their accounts in any pit-traded product of either exchange from the consolidated trading floor. In accordance with CME and CBOT Rule 536, existing recordkeeping and audit trail requirements will apply. This requires that an order be recorded on an order ticket and contain appropriate timestamps or, if placed verbally, be recorded by the member on a sequenced-trading card if the member uses trading cards to record transactions. The prohibition set forth in the fourth paragraph of this Advisory Notice with respect to members who also hold a broker assistant badge remains applicable.

Non-member fees will apply to trading in 1) products of a member's home exchange which are outside the scope of the member's division or series and 2) any cross-exchange product other than products included in the Expanded-Access Product ("EAP") program.

Questions regarding this Advisory should be directed to the following individuals in Market Regulation:

Jennifer Baum, Associate Director	312.341.3124
Robert Sniegowski, Associate Director	312.648.5493
Kathleen Zaino, Associate Director	312.930.2341

MARKET REGULATION ADVISORY NOTICE

Exchange	CME & CBOT
Subject	Trading Floor Consolidation Rule Changes: Trading Restrictions Applicable to Employees of Members; Mandatory Headset Recording Requirement
Rule References	Rules 501 and 536.G.
Advisory Date	April 2, 2008
Advisory Number	CME & CBOT – RA0808-3
Effective Dates	April 7, 2008 – CME Equity Complex & CBOT April 28, 2008 – CME FX and Interest Rate Complex May 19, 2008 – CME Commodity Complex

CME & CBOT Rule 501 (“Employees of Members”)

CME and CBOT will adopt substantially harmonized rule language with respect to Rule 501 (“Employees of Members”) as the transition to the consolidated trading floor takes place. **The amended rule prohibits all non-member floor employees of members and member firms from trading or having any interest in an account that trades CME or CBOT products.** Previously, the prohibition restricted trading of non-member employees only in the products of their home exchange.

CME Rule 501 also adopts language, consistent with existing CBOT Rule 501, which allows for broker assistants in CME pits and specifies related restrictions and reporting requirements. Broker assistants are employees of members who are permitted to stand in a trading pit. The introduction of broker assistants in CME pits will be addressed on a pit by pit basis, subject to demand and space considerations, following the completion of the trading floor consolidation.

Modified CME & CBOT Rule 501 will become effective on April 7 for the CBOT and for the CME Equity complex, on April 28 for the CME FX and Interest Rate complexes, and on May 19 for the CME Commodity complex, concurrent with the relocation of CME trading pits to the consolidated trading floor.

The text of CME & CBOT Rule 501 begins on page 3 of this Advisory Notice.

CME & CBOT Rule 536.G. (“Telephone Recordings”)

CME and CBOT currently require members and member firms that record telephone lines on the exchange floor to retain the resulting recordings for a period of 10 business days following the day on which the recordings are made.

Additionally, concurrent with the consolidation of the trading floor, all communications conducted via headset are required to be recorded by the member or member firm authorized to use the headset. These recordings must be retained for a minimum of 10 business days following the day on which the recording is made. For the purposes of this rule, a telephone in or on the perimeter of a trading pit shall be treated in the same manner as a headset.

The aforementioned recording requirements are currently in place at CBOT. The headset recording requirements will become effective on April 7 for the CME Equity complex, on April 28 for the CME FX and Interest Rate complexes, and on May 19 for the CME Commodity complex, concurrent with the relocation of CME trading pits to the consolidated trading floor.

The Exchange provides recording services for a fee, and members and member firms wishing to utilize the exchange administered voice recording system should contact Bryan O'Donnell, Associate Director, Telecommunications Department, at 312.341.3190.

The text of the Rule 536.G. is presented below.

536.G. Telephone Recordings

Members and member firms that record conversations conducted on their Exchange Floor telephone lines must maintain the resultant recordings for a period of 10 business days following the day when such recordings are made.

Unless specifically exempted by the Market Regulation Department or designated Exchange staff, all headset communications must be voice recorded by the member or member firm authorized to use the headset and all such recordings must be maintained for a minimum of 10 business days following the day on which the recording is made. Members and member firms are permitted to utilize their own recording devices, provided that the devices meet reasonable standards with respect to quality and reliability. Alternatively, members and member firms may utilize an Exchange administered voice recording system for a fee.

Questions regarding this Advisory should be directed to the following individuals in Market Regulation:

Jennifer Baum, Associate Director	312.341.3124
Robert Sniegowski, Associate Director	312.648.5493
Kathleen Zaino, Associate Director	312.930.2341

Text of CME Rule 501

501. EMPLOYEES OF MEMBERS

Members shall register with the Exchange all persons whom they wish to employ on the trading floor. Such employees may act as runners, communicators, clerks and broker assistants. Such employees shall not be permitted to solicit customers or benefit from the production of orders, except as provided in Rule 140. Such employees shall not trade or have any interest in an account trading in any CME or CBOT futures or options contracts. Employees must wear a prescribed identification badge. Any member permitting trading by such employee shall be guilty of an offense against the Exchange. Remuneration to such employees shall be limited to salaries and normal bonuses. The member employer shall, upon request, provide a report to Exchange staff with respect to each such employee, setting forth the hours of employment, salary and bonus, and a copy of each employee's Internal Revenue Service W-2 Form or other documentation evidencing employment.

The following shall apply to any IMM, IOM or GEM member who also holds a broker assistant badge. Such person shall not trade for, or carry in his account or an account in which he has any interest, any positions in contracts traded on the Exchange except for those contracts which he is entitled to trade as principal or broker for others by virtue of his membership status as referenced above.

A member holding a broker assistant badge shall be required to notify his qualifying clearing member, as defined in Rule 903, of the name, address and immediate supervisor of the member or member firm by whom he is employed as a broker assistant. Upon a qualifying clearing member's revocation of trading authorization in accordance with Rule 903.E., the qualifying clearing member immediately shall give written notice to the member or member firm which employs a member as a broker assistant that the member's trading authorization has been revoked. A member holding a broker assistant badge shall be denied floor access privileges upon the revocation of trading authorization by his qualifying clearing member. The floor access privileges of a member who holds a broker assistant badge may be reinstated upon the filing of a release with the Shareholder Relations and Membership Services Department by the member's qualifying clearing member in accordance with Rule 903.D.

Members shall be responsible for ensuring that their employees comply with all Exchange rules and may, subject to a determination by an Exchange disciplinary committee, be liable for any fines imposed upon such employees by the Exchange. The Exchange may, in its sole discretion, notify a member of the existence of an Exchange investigation and the conduct which is the subject of the investigation involving one of the member's employees when the Market Regulation Department interviews such employee or, if no such interview occurs, when charges are issued against the employee by the Probable Cause Committee.

No person shall be registered as an employee pursuant to this rule if such person is determined by Exchange staff not to be of good moral character or if it is determined that such registration may be detrimental to the interest or welfare of the Exchange.

Text of CBOT Rule 501

501. EMPLOYEES OF MEMBERS

Members shall register with the Exchange all persons whom they wish to employ on the trading floor. Such employees may act as runners, communicators, clerks and broker assistants. Such employees shall not be permitted to solicit customers or benefit from the production of orders. Such employees shall not trade or have any interest in an account trading in any CBOT or CME futures or options contracts. Employees must wear a prescribed identification badge for which quarterly fees must be paid. Any member permitting trading by such employee shall be guilty of an offense against the Exchange. Remuneration to such employees shall be limited to salaries and normal bonuses. The member employer shall, upon request, provide a report to Exchange staff with respect to each such employee, setting forth the hours of employment, salary and bonus, and a copy of each employee's Internal Revenue Service W-2 Form or other documentation evidencing employment.

The following shall apply to any Series B-2 (Associate), Series B-3 (GIM), Series B-4 (IDEM), or Series B-5 (COM) member or permit holder who also holds a floor clerk or broker assistant badge. Such person shall not trade for, or carry in his account or an account in which he has any interest, any positions in contracts traded on the Exchange except for those contracts which he is entitled to trade as principal or broker for others by virtue of his membership or permit holder status as referenced above.

A member holding a floor clerk or broker assistant badge shall be required to notify his qualifying clearing member, as defined in Rule 903, of the name, address and immediate supervisor of the member or member firm by whom he is employed as a floor clerk or broker assistant. Upon a qualifying clearing member's revocation of trading authorization in accordance with Rule 903.E., the qualifying clearing member immediately shall give written notice to the member or member firm which employs a member as a floor clerk or broker assistant that the member's trading authorization has been revoked. A member holding a floor clerk or broker assistant badge shall be denied floor access privileges upon the revocation of trading authorization by his qualifying clearing member. The floor access privileges of a member who holds a floor clerk or broker assistant badge may be reinstated upon the filing of a release with the Shareholder Relations and Membership Services Department by the member's qualifying clearing member in accordance with Rule 903.D.

Members shall be responsible for ensuring that their employees comply with all Exchange rules and may, subject to a determination by an Exchange disciplinary committee, be liable for any fines imposed upon such employees by the Exchange. The Exchange may, in its sole discretion, notify a member of the existence of an Exchange investigation and the conduct which is the subject of the investigation involving one of the member's employees when the Market Regulation Department interviews such employee or, if no such interview occurs, when charges are issued against the employee by the Probable Cause Committee.

No person shall be registered as an employee pursuant to this rule if such person is determined by Exchange staff not to be of good moral character or if it is determined that such registration may be detrimental to the interest or welfare of the Exchange.