



April 6, 2009

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

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C.F.T.C.
OFFICE OF THE SECRETARIAT

**RE: CBOT Rule 11C01.F. ("Position Limits")
 CBOT Rule 17A01.F. ("Position Limits")
 CBOT Position Limit and Reportable Level Table
 CBOT Submission No. 09-059**

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT") hereby notifies the Commodity Futures Trading Commission that it is making minor amendments to correct inaccuracies in the position limit rules in Chapter 11C ("Soybean Board Crush Spread Options") and Chapter 17 ("Options on Rough Rice Futures") and the Position Limit and Reportable Level Table in the Interpretations and Special Notices Section of Chapter 5 of the CBOT Rulebook. The amendments to Rules 11C01.F. and 17A01.F. eliminate inaccurate references to futures contracts in the options chapter, an error made at the time of drafting. Corresponding changes have also been incorporated into the Position Limit and Reportable Level Table.

The text of the 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. 09-059 in any related correspondence.

Sincerely,

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

Chapter 11C – Soybean Board Crush Spread Options

[The only changes are in Rule 11C01.F. as set forth below.]

11C01.F. Position Limits

In accordance with Rule 559, Position Limits and Exemptions, no person shall own or control positions in excess of:

1. 1,000 futures-equivalent contracts net long or net short in any single contract month. ~~Additional futures contracts may be held as part of futures/futures spreads within a crop year provided that the total of such positions, when combined with outright positions, does not exceed the all months combined limit.~~
2. 1,000 futures-equivalent contracts net long or net short in all months combined.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

Chapter 17A – Options on Rough Rice Futures

[The only changes are in Rule 17A01.F. as set forth below.]

17A01.F. Position Limits

In accordance with Rule 559, Position Limits and Exemptions, no person shall own or control positions in excess of:

1. 600 futures-equivalent contracts net long or net short in the spot month subject to the special provisions regarding the July and September contracts set forth in Rule 17102.E.
2. 1,800 futures-equivalent contracts net long or net short in any single contract month excluding the spot month. ~~Additional futures contracts may be held outside of the spot month as part of futures/futures spreads within a crop year provided that the total of such positions, when combined with outright positions, does not exceed the all months combined limit.~~
3. 1,800 futures-equivalent contracts net long or net short in all months combined.

Refer to Rule 559. for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

Position Limit and Reportable Level Table (in pertinent part)

AGRICULTURAL								
Corn & mini-sized Corn	Y		600 (aggregate see #10)	13,500 (aggregate, see #1,10)	22,000 (aggregate, see #1,3,10)		250 (individual, see #11)	250
Soybeans & mini-sized Soybeans	Y		600 (aggregate see #10)	6,500 (aggregate, see #1,10)	10,000 (aggregate, see #1,4,10)		150 (individual, see #11)	150
South American Soybeans		(see #12)	600	3,500 (see #1)	5,500 (see #1)		25	
Wheat & mini-sized Wheat	Y	(see #8)	600 (aggregate see #10)	5,000 (aggregate, see #1,10)	6,500 (aggregate, see #1,7,10)		150 (individual, see #11)	150
Oats	Y		600	1,400 (see #1)	2,000 (see #1,6)		60	60
Rough Rice	Y	200 / 250 (see #5)	600	1,800	1,800 (see #2)		50	50
Soybean Oil	Y		540	5,000 (see #1,7)	6,500 (see #1,7)		200	200
Soybean Meal	Y		720	5,000 (see #1,7)	6,500 (see #1,7)		200	200
Soybean Crush Options	Y			1,000 (see #1)	1,000			100
Ethanol (see #14)	Y		200	1,000	1,000	N/A / 25 (see #15)	25	25 (see #15)
NY Harbor Denatured Fuel Ethanol Basis Swap		N/A	N/A	N/A	N/A	25	25	N/A
Gulf Coast Denatured Fuel Ethanol Basis Swap		N/A	N/A	N/A	N/A	25	25	N/A
Los Angeles Denatured Fuel Ethanol Basis Swap		N/A	N/A	N/A	N/A	25	25	N/A
Ethanol Forward Month Swap		N/A	N/A	N/A	N/A	25/25	25	25

#1 Additional futures contracts may be held outside of the spot month as part of futures/futures spreads within a crop year provided that the total of such positions, when combined with outright positions, do not exceed the all months combined limit. In addition, a person may own or control additional options in excess of the futures-equivalent limits provided that those option contracts in excess of the futures-equivalent limits are part of an eligible option/futures spread.

#2 ~~Reserved~~ No more than 1,800 futures-equivalent contracts net on the same side of the market are allowed in a single month in all strike prices combined. Additional options contracts may be held as part of option/options or option/futures spreads between months within the same crop year provided that the total of such positions, when combined with outright positions, does not exceed the all months combined limit. The futures equivalents for both the options and futures contracts are aggregated to determine compliance with these net same side single month position limits.