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April 24, 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 Position Limit and Reportable Level Table  
CME Submission No. 08-74

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME") hereby notifies the Commission of amendments to the CME Position Limit and Reportable Level Table ("Table") in the Interpretations & Special Notices Relating to Chapter 5 section of the CME Rulebook to reflect the April 27, 2008, listing of Nonfarm Payroll futures and options. The Table also reflects the addition of S&P 500/Financial SPCTR<sup>®</sup> and S&P 500/Technology SPCTR<sup>®</sup> futures, correcting the prior omission of these products from the Table. The text of the amended Table is attached, with additions underlined and deletions overstruck.

CME certifies that these changes 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 this matter, 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

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**POSITION LIMIT AND REPORTABLE LEVEL TABLE**

CONTRACT NAME	Options	SCALE-DOWN SPOT MONTH (1)	SCALE-DOWN SPOT MONTH (2)	SPOT MONTH	SINGLE MONTH	ALL MONTHS COMBINED	POSITION ACCOUNTABILITY	REPORTABLE FUT LEVEL	REPORTABLE OPT LEVEL
<b>CME Foreign Exchange</b>									
Australian Dollar	Y						**6,000	200	200
Australian Dollar/Canadian Dollar							**6,000	25	
Australian Dollar/Japanese Yen							**6,000	25	
Australian Dollar/New Zealand							**6,000	25	
Brazilian Real	Y				*24,000	*40,000		25	25
British Pound	Y						**10,000	200	200
British Pound/Japanese Yen							**6,000	25	
British Pound/Swiss Franc							**6,000	25	
Canadian Dollar	Y						**6,000	200	200
Canadian Dollar/Japanese Yen							**6,000	25	
Chinese Renminbi/Euro FX	Y			2,000			**6,000	25	25
Chinese Renminbi/Japanese Yen	Y			2,000			**6,000	25	25
Chinese Renminbi/US Dollar	Y			2,000			**6,000	25	25
Czech Koruna	Y			2,000			**6,000	25	25
E-mini Euro FX							*(A) 20,000	25	
E-mini Japanese Yen							*(A) 20,000	25	
Euro FX	Y						**10,000	200	200
Euro FX/Australian Dollar							**6,000	25	
Euro FX/British Pound	Y						**6,000	25	25
Euro FX/Canadian Dollar							**6,000	25	
Euro FX/Czech Koruna	Y			2,000			**6,000	25	25
Euro FX/Hungarian Forint	Y			2,000			**6,000	25	25
Euro FX/Japanese Yen	Y						**6,000	25	25
Euro FX/Norwegian Krone							**6,000	25	
Euro FX/Polish Zloty	Y			2,000			**6,000	25	25
Euro FX/Swedish Krona							**6,000	25	
Euro FX/Swiss Franc	Y						**6,000	25	25
Hungarian Forint	Y			2,000			**6,000	25	25
Israeli Shekel	Y			2,000			**6,000	25	25
Japanese Yen	Y						**10,000	200	200
Korean Won	Y			2,000			**6,000	25	25
Mexican Peso	Y			10,000			**6,000	25	25
New Zealand Dollar	Y						**6,000	25	25
Norwegian Krone							**6,000	25	
Polish Zloty	Y			2,000			**6,000	25	25
Russian Ruble	Y			2,000		*10,000		25	25
South African Rand	Y			5,000			**6,000	25	25
Swedish Krona							**6,000	25	25
Swiss Franc	Y						**10,000	200	200
Swiss Franc/Japanese Yen							**6,000	25	

\*(A) E-mini Euro FX and the E-mini Japanese Yen are deemed to be the equivalent of one-half (.50) of the Euro FX and Japanese Yen contract.

\* Net futures equivalents (NFE) long or short.

\*\* Position Accountability rule: A person owning or controlling more than the specified number of futures or futures equivalent contracts net long or short in all contract months combined shall provide, in a timely fashion, upon request by the Exchange, information regarding the nature of the position, trading strategy, and hedging information if applicable

CONTRACT NAME	Options	SCALE-DOWN SPOT MONTH (1)	SCALE-DOWN SPOT MONTH (2)	SPOT MONTH	SINGLE MONTH	ALL MONTHS COMBINED	POSITION ACCOUNT ABILITY	REPORTABLE FUT-LEVEL	REPORTABLE OPT-LEVEL
<b>CME Equity Index</b>									
E-Mini EAFE						*10,000		25	
E-Mini Nasdaq Biotech Stock Index						*10,000		25	
E-Mini Nasdaq Composite Index						*25,000		25	
E-Mini Nasdaq-100	Y					*(B) 10,000		25	25
E-Mini Russell 2000	Y					*(B) 10,000		100	100
E-Mini S&P 500	Y					*(C) 20,000		100	100
E-Mini S&P 500 End of Mo. Options	Y					*(C) 20,000			100
E-Mini S&P Asia 50						*25,000		25	
E-Mini S&P MidCap 400	Y					*(B) 5,000		25	25
Eurozone Harmonized Index						*5,000		25	
Ishares Russell 2000 Index Fund				*(A) 13,500				25	
Nasdaq-100	Y					*(B) 10,000		25	25
Power Shares QQQ (Nasdaq-100 Tracking)				*(A) 11,250				25	
Nikkei 225	Y					*5,000		50	50
Nikkei 225 (JPY)	Y					*5,000		25	25
Russell 2000	Y					*(B) 10,000		100	100
Russell 2000 Amer. Flex Options	Y					*(B) 10,000			25
S&P 500	Y					*(C) 20,000		100	100
S&P 500 American Flex Options	Y					*(C) 20,000			25
S&P 500 Depository Receipts				*(A) 22,500				25	
S&P 500 End of Mo. Options	Y					*(C) 20,000			100
S&P 500 European Flex Options	Y					*(C) 20,000			25
S&P 500 Growth	Y					*(C) 20,000		25	25
S&P 500 Value	Y					*(C) 20,000		25	25
<b>S&amp;P 500/Financial SPCTR</b>						<b>*25,000</b>			<b>25</b>
<b>S&amp;P 500/Technology SPCTR</b>						<b>*25,000</b>			<b>25</b>
S&P MidCap 400	Y					*(B) 5,000		25	25
S&P SmallCap 600						*25,000		25	
E-mini FTSE Xinhua China 25						*5,000		25	
Lehman Brothers US Aggregate Index	Y					*5,000		25	25
E-mini MSCI Emerging Markets						*5,000		25	
TRAKRS Index						*22,000,000		50,000	

\*(A) No more than the specified number of futures contracts net long or net short during the last five days of an expiring contract month.

\*(B) This is an aggregate position limit and is the specified number of futures or futures equivalent contracts net long or net short in all contract months combined. For the purpose of aggregation, one big futures contract shall be deemed equivalent to five E-Mini futures contracts.

\*(C) This is an aggregate position limit in Standard & Poor's 500 Stock Price Index (S&P 500) futures and options, S&P 500 Growth futures, S&P 500 Value futures, and E-Mini S&P 500 futures and options, and is the specified number of S&P 500 futures or futures equivalent contracts net long or net short in all contract months combined. For purpose of aggregation: One S&P 500 futures contract shall be deemed equivalent to one S&P 500 Growth futures contract plus one S&P 500 Value futures contract. One S&P 500 futures contract shall be deemed equivalent to five E-Mini S&P 500 futures contracts.

\* Net futures equivalents (NFE) long or short.

CONTRACT NAME	Options	SCALE-DOWN SPOT MONTH (1)	SCALE-DOWN SPOT MONTH (2)	SPOT MONTH	SINGLE MONTH	ALL MONTHS COMBINED	POSITION ACCOUNT-ABILITY	REPORTABLE FUT LEVEL	REPORTABLE OPT LEVEL
<b>CME Interest Rate</b>									
13 Week Treasury Bill	Y			15%		*(A) 5,000		100	100
3 Month Eurodollar	Y						*(B) 10,000	850	850
3 Month Eurodollar -E-Mini							*(C) 100,000	25	
5 Year Eurodollar Bundle-E-Mini							**1,000	45	
Eurodollar SWAP							**5,000	25	
Euroyen	Y					*5,000		25	25
Euroyen Libor	Y					*5,000		25	25
MidCurve Eurodollar	Y						*(B) 10,000		25
One Month Libor	Y						**5,000	100	100
CME Credit Index Event						*5,000		25	
<p>*(A) No more than the specified number of contracts net long or net short in all contract months combined, except that in no event shall own or control more than the numbers of contracts that correspond to fifteen percent of the announced auction amount of the 91-day U.S. Treasury Bill auction to which the contract settles in the lead month on or after the day two days prior to the delivery day.</p> <p>*(B) Net Futures Equivalent Positions are combined across Eurodollar, Eurodollar E-mini, and Mid-Curve futures and options to determine Position Accountability.</p> <p>*(C) 100,000 net long or short but 10,000 net futures equivalents and is combined with ED, E-mini ED, and Midcurves.</p> <p>*Net futures equivalents (NFE) long or short.</p> <p>** Position Accountability rule: A person owning or controlling more than the specified number of futures or futures equivalent contracts net long or short in all contract months combined shall provide, in a timely fashion, upon request by the Exchange, information regarding the nature of the position, trading strategy, and hedging information if applicable.</p>									
<b>CME Commodities</b>									
Butter	Y	50		150	*900	*1,000		25	25
Cash-Settled Butter	Y			100	*500			25	25
Class III Milk	Y				*1,500			25	25
Class IV Milk	Y			250	*1,000			25	25
Dry Whey	Y			200	*1,000			25	25
Feeder Cattle	Y			300	*1,000			25	25
Frozen Pork Bellies	Y	*(A) 75 or 50 or 25	*(B) 25 or 10	100	*800	*1,000		5	5
Goldman Sachs Commodity Index	Y					*10,000		25	25
Goldman Sachs ER Index						*10,000		25	
Lean Hogs	Y			950	*4,100			25	25
Live Cattle	Y	300		450	*5,400			25	25
Random Length Lumber	Y			435	*1,000			25	25
Nonfat Dry Milk	Y			100	*1,000			25	25
Northern Bleached Softwood KP	Y				*1,000			25	25
<p>*(A) The scale-Down levels in the spot month depends on "Deliverable Supply" shall mean the number of registered deliverable pork bellies reported to the CME Clearing House Department's weekly report immediately <i>preceding</i> the first Friday of each expiring contract.</p> <p>*(B) The scale-Down levels in the spot month depends on "Deliverable Supply" shall mean the number of registered deliverable pork bellies reported to the CME Clearing House Department's weekly report immediately <i>following</i> the first Friday of each expiring contract.</p> <p>*Net futures equivalents (NFE) long or short.</p>									
<b>CME Weather, Housing, Nonfarm Payroll</b>									
Housing Index	Y					*(A) 5,000		25	25
US Commercial Real Estate (SPCREX) Index	Y					*5,000		25	25
Weather	Y					*10,000		25	25
Carville Hurricane Index	Y						**10,000	25	25
<b>Nonfarm Payroll</b>	Y					<b>*5,000</b>		<b>25</b>	<b>25</b>
<p>*(A) No more than the specified number of contracts net long or net short in any single CME Metro Area Housing Index futures contract or it's composite index in all contract months combined.</p> <p>*Net futures equivalents (NFE) long or short.</p> <p>** Position Accountability rule: A person owning or controlling more than the specified number of futures or futures equivalent contracts net long or short in any single contract in all contract months combined shall provide, in a timely fashion, upon request by the Exchange, information regarding the nature of the position, trading strategy, and hedging information if applicable.</p>									