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April 28, 2008

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

Re: Regulation §40.5. Request for Commission Rule Approval of Amendments to  
CME Rules 10202 and 102A01.  
CME Submission #08-79.

Dear Mr. Stawick,

I. SUBMISSION

In accordance with Regulation §40.5, Chicago Mercantile Exchange Group ("Exchange") hereby requests review and approval, under the provisions of Regulation §40.5, of amendments to CME Feeder Cattle Futures Rule 15202.E and Options on CME Feeder Cattle Futures Rule 102A01.F.

II. TEXT OF PROPOSED RULE CHANGES

The text of the proposed rule amendments is given below. Deletions are overstruck, additions are underlined.

**FEEDER CATTLE FUTURES**

**10202. FUTURES CALL**

**E. Position Limits**

No person shall own or control more than:

1. ~~4,000~~ 1,500 contracts long or short in any contract month;
2. 300 contracts long or short in the spot month during the last ten days of trading.

For positions involving options on Feeder Cattle futures, this rule is superseded by the option speculative position limit rule.

**OPTIONS ON FEEDER CATTLE FUTURES**

**102A01. OPTION CHARACTERISTICS**

**F. Position Limits**

No person shall own or control a combination of options and underlying futures that exceeds:

1. ~~4,000~~ 1,500 futures equivalent contracts net on the same side of the market in any contract month;
2. 300 futures equivalent contracts net on the same side of the market in the spot month during the last ten days of trading.

For the purpose of this rule, the futures equivalent of an option contract is 1 times the previous business day's IOM risk factor for the option series. Also for purposes of this rule, a long call option, a short put option, and along underlying futures contract are on the same side of the market; similarly, a short call option, a long put option, and a short underlying futures contract are on the same side of the market.

### III. EFFECTIVE DATE AND RULE PROMULGATING AUTHORITY

The Exchange, pursuant to Rule 230.j., approved these proposed amendments on April 25, 2008. The amendments will become effective for all contract months after Commission approval.

### IV. OPERATION, PURPOSE AND EFFECT OF THE PROPOSED AMENDMENTS

The amendments increase the speculative position limits of Feeder Cattle futures and options for non-spot contract months.

The increase for non-spot contract months is based on the increased levels of open interest in 2007. The level of 1500 contracts was arrived at using a formula established by Regulation §150.5(c)(2). The data used in the calculation has been sent electronically to the Commission's staff for review.

### V. OPPOSING VIEWS

There were no substantive opposing views to the proposed amendments.

### VI. APPLICATION OF THE ACT AND REGULATIONS

There does not appear to be any need for amendment or interpretation of the Act and Regulations in order to approve the proposed amendments.

### VII. CONFIDENTIAL TREATMENT

Confidential treatment is not requested for this submission.

If you require any additional information regarding this submission, please do not hesitate to contact Jack Cook at 312-930-3295 or via e-mail at [jack.cook@cmegroup.com](mailto:jack.cook@cmegroup.com) or me. Please reference our CME Submission number in any related correspondence.

Sincerely,

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