

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

2009 MAY 4 PM 3 28

May 1, 2009

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 Rule 588.K.; NYMEX Rule 11G.588.K.; CBOT Chapter 5 Position Limit & Reportable Level Table; CBOT Rules 703, 708 and 712; and Various Interpretations & Special Notices Section of CBOT Chapter 7 Removal of South American Soybean futures references from the CME, CBOT and NYMEX Rulebooks CME/CBOT/NYMEX Submission No. 09-086

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME"), the Chicago Board of Trade, Inc. ("CBOT") and the New York Mercantile Exchange, Inc. ("NYMEX") (collectively, "the Exchanges") hereby notify the Commodity Futures Trading Commission that the Exchanges are removing all references to the recently delisted CBOT South American Soybean futures contract from the CME, CBOT and NYMEX Rulebooks. The CBOT South American Soybean futures contract was delisted as of April 27, 2009 and is no longer available for trading.

The rule changes are attached showing the elimination of the references, with additions underlined and deletions overstruck.

The Exchanges certify that these changes comply with the Commodity Exchange Act and regulations thereunder.

If you require any additional information regarding this action, please do not hesitate to contact John D. Hill at 312.930.1852 or via e-mail at <u>John.Hill@CMEGroup.com</u> or contact me at 312.648.5422. Please reference Submission No. 09-086 in any related correspondence.

Sincerely,

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

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Additions are underlined and deletions are struck through.

CME/CBOT Rule 588.K. and NYMEX Rule 11G.588.K.

No Duct Demace

No Bust Ranges	
Futures Contract	No Bust Range
Soybean Oil	.80 cents per pound
South American Soybeans	20 cents per bushel
Lean Hogs	\$0.0100 per pound

CBOT Position Limit and Reportable Level Table

And	Sector Sector	SCALE-DOWN SPOT MONTH	SPOT MONTH	SINGLE MONTH	ALL MONTHS	POSITION ACCOUNTABILITY Futures/Options	REPORTABLE FUTURES LEVEL	REPORTABLE OPTIONS LEVEL
				AGRICULTU	RAL			
				6,500	10,000			
Soybean Calendar Swap	- 1			(see #1)	(see #1)		25	N/A
			600	3,500	5,500			
South American Soybeans		(see #12)		(see #1)	(see #1)		25	
			600	5,000	6,500			
			(aggregate	(aggregate,	(aggregate, see		150 (individual,	
Wheat & mini-sized Wheat	Y	(see #8)	see #10)	see #1,10)	#1,7,10)		see #11)	150

#12 <u>Reserved</u> In the last five trading days of the expiring futures month, the speculative position limit for the November futures month will be 180 contracts and for the January futures month the speculative position limit will be 100 contracts.

CBOT Chapter 7

703.A. Conditions for Approval

Warehouses or shipping stations (hereafter "facilities") may be declared regular for delivery with the approval of the Exchange. Persons operating facilities who desire to have such facilities made regular for delivery under the rules shall make application for an initial Declaration of Regularity on a form prescribed by the Exchange prior to May 1 of an even-numbered year (an odd-numbered year for Ethanol and South American Soybeans), for a two-year term beginning July 1 of that year, and at any time during a current term for the balance of that term.

Applications for a renewal of regularity shall be made prior to May 1 of even-numbered years (oddnumbered years for Ethanol and South American Soybeans) for the respective years beginning July 1 of those years, and shall be on the same form.

Facilities that desire to increase their regular capacity during a current term shall make application for the desired amount of total regular capacity on the same form.

Initial regularity and increases in regularity shall be effective either thirty days after the Exchange posts a notice that a bona fide application has been received or the day after the application is approved by the Exchange, whichever is later.

Facilities regular for delivery of Corn, Soybeans, South American Soybeans, Soybean Oil, Soybean Meal or Denatured Fuel Ethanol that desire to have their daily rate of loading decreased shall file with the Exchange a written request for such decrease at which time a notice will be posted by the Exchange. The decrease in the daily rate of loading for the facility will become effective thirty days after a notice has been posted by the Exchange or the day after the number of outstanding certificates or receipts at the facility is equal to or less than 20 times the requested rate of loading (15 times the

requested rate of loading for Soybean Meal and Denatured Fuel Ethanol), whichever is later.

Regular facilities that wish to have their regular capacity space decreased shall file with the Exchange a written request for such decrease and such decrease shall become effective once a notice has been posted by the Exchange.

The Exchange may establish such requirements and conditions for approval of regularity as it deems necessary. The application for regularity prescribed by the Exchange shall set forth conditions of regularity as well as other agreements with which the operator of the regular facility shall comply. In addition to any conditions and agreements contained in such application or in the relevant product chapter, the following shall constitute conditions for regularity and requirements with which the operator of a regular facility shall comply:

(1) The facility making application shall be inspected by the Exchange, the United States Department of Agriculture, or other government agency, as applicable. Where application is made to list as regular a facility which is not regular at the time of such application, the applicant may be required to remove all product from the facility and permit the facility to be inspected and the product graded, after which such product may be returned to the facility.

(2) The operator of such facility shall be in good financial standing and credit, and shall meet the minimum financial requirements and financial reporting requirements set forth in Rule 708. No facility shall be declared regular until the person operating the facility files a bond and/or designated letter of credit with sufficient sureties, or deposits with the Exchange, treasury securities, or other collateral deemed acceptable to the Exchange, in such sum and subject to such conditions as the Exchange may require. Any such sums shall be reduced by SEC haircuts, as specified in SEC Rule 15c3-1(c)(2)(vi), (vii) and (viii). If the facility deposits treasury securities or any other collateral with the Exchange, it must execute a security agreement on a form prescribed by the Exchange.

(3) The facility shall be provided with modern improvements and appliances for the convenient and expeditious receiving, handling and shipping of product in bulk.

(4) The operator of the facility shall comply with the system of registration of warehouse receipts or shipping certificates as established by the Exchange.

(5) The operator of the facility shall furnish accurate information to the Exchange regarding all product received and delivered by the facility on a daily basis and/or that product remaining in store at the close of each week, as required by the Exchange.

(6) The operator of the facility shall promptly advise the Registrar of any damage to product held in store by it, whenever such damage shall occur to an extent that will render the product undeliverable.

(7) The operator of the facility shall permit the Exchange, at any time, to examine the books and records of the facility, for the purpose of ascertaining the stocks of all kinds of product which may be on hand. The Exchange shall have the authority to determine the quantity of product in the facility and to compare the books and records of the facility with the records of the Exchange.

(8) The operator of the facility shall make such reports, keep such records and permit such facility visitation as the Exchange, the Commodity Futures Trading Commission or any other applicable government agency may require.

(9) The operator of the facility shall give assurance that all product tendered in satisfaction of futures contracts shall be weighed, as applicable, under the supervision of a party approved by the Exchange.

(10) The operator of the facility shall not engage in unethical or inequitable practices, and shall comply with all applicable federal or state statutes, rules or regulations.

(11) Persons operating regular facilities shall be subject to the Exchange's Rules, the disciplinary procedures set forth in Chapter 4, and the arbitration procedures set forth in Chapter 6, and shall abide by and comply with the terms of any disciplinary decision imposed or any arbitration award issued against it pursuant to the Exchange's Rules.

(12) Persons operating regular facilities shall consent to the disciplinary jurisdiction of the Exchange for five years after such regularity lapses, for conduct which occurred while the facility was regular.

The Exchange, in its sole discretion, may determine not to approve facilities for regularity, or for increases in regular capacity of existing regular facilities, regardless of whether such facilities meet the preceding requirements and conditions. Some factors that the Exchange may, but is not required to, consider in exercising its discretion include, among others, whether receipts or shipping certificates issued by such facilities, if tendered in satisfaction of futures contracts, might be expected to adversely affect the price discovery function of futures contracts or impair the efficacy of futures trading in the relevant market, or whether the currently approved regular capacity provides for an adequate deliverable supply.

708. MINIMUM FINANCIAL REQUIREMENTS FOR AGRICULTURAL REGULARITY

The minimum financial requirements for firms which are regular to deliver agricultural and ethanol products are:

1. Working Capital - (current assets excluding current receivables from affiliates/parent company less current liabilities) must be greater than or equal to \$2,000,000 or \$1,000,000 for firms regular for delivery in Rough Rice and Denatured Fuel Ethanol futures. All current assets must be readily marketable. Firms which do not have \$2,000,000 (\$1,000,000 for rice and ethanol) in Working Capital must deposit with the Exchange treasury securities or other collateral deemed acceptable to the Exchange, in such sum and subject to such conditions as the Exchange may require. Any such sums shall be reduced by SEC haircuts, as specified in SEC Rule 15c3-1(c)(2)(vi), (vii), and (viii). If the warehouseman/shipper deposits treasury securities, it must execute a security agreement on a form prescribed by the Exchange. The Exchange may grant an exemption from the working capital requirements described above, in its sole discretion.

2. Net Worth - (Total assets less total liabilities) divided by the firm's allowable capacity (measured in contracts) must be greater than \$5,000. The net worth of a firm regular to deliver corn, wheat, soybeans, South American Soybeans or ethanol must be greater than or equal to \$5,000,000. The operator of a facility issuing corn, wheat, soybean, South American Soybean or ethanol shipping certificates may only issue new shipping certificates when the total value of all registered shipping certificates, at the time of issuance of the new shipping certificates, does not exceed 50% of net worth;

3. Each firm which is regular to deliver agricultural or ethanol products is required to file a yearly certified financial statement within 90 days of the firm's year-end. Each firm is also required to file within 45 days of the statement date unaudited quarterly financial statements for each of the three quarters which do not end on the firm's year-end. In addition, the Exchange may request additional financial information as it deems appropriate. All financial statements are to be submitted in English.

4. A Letter of Attestation must accompany all unaudited financial statements. The Letter of Attestation must be signed by the Chief Financial Officer or if there is none, a general partner, executive officer, or managerial employee who has the authority to sign financial statements on behalf of the firm and to attest to their correctness and completeness.

5. Any firm that has been approved to deliver against a CBOT contract must notify the Exchange in writing within two business days of any event or series of events, including any withdrawal, advance, loan or loss that, on a net basis, causes a twenty percent (20%) or more reduction of its net worth as last reported by submission of a financial statement.

6. Any change in the organizational structure of a firm that is regular for delivery requires that the firm notify the Exchange prior to such change. Changes in organizational structure shall include, but not be limited to, a corporation, limited liability company, general partnership, limited partnership, or sole proprietorship that changes to another form. Prior to any such change occurring, the firm is also required to notify the Exchange in writing of any name change.

For other applicable provisions, see "Letter of Credit and Bond Standards" in the Interpretations section of this chapter.

712.A. Delivery of Commodities

Deliveries of rice and soybean oil shall be made by the delivery of registered warehouse receipts issued by warehousemen against stocks in warehouses which have been declared regular by the Exchange. The Exchange, by rule, may prescribe the conditions upon which warehouses and warehousemen may become regular except that in the case of federally licensed warehouses and warehousemen, the Exchange may impose only such reasonable requirements as to location, accessibility and suitability as may be imposed on other regular warehouses and warehousemen. The Exchange, by rule, may prescribe conditions not inconsistent with the provisions of this Chapter upon which warehouse receipts issued by regular warehouses shall be deliverable.

Deliveries of corn, oats, wheat, soybeans, soybean meal, South American Soybeans and ethanol shall be made by delivery of registered shipping certificates issued by shippers designated by the Exchange as regular to issue shipping certificates for such commodities. Shipping certificates for such commodities and warehouse receipts for soybean oil shall be delivered using the electronic fields which the Exchange and the Clearing House require to be completed. In order to effect a valid delivery each such shipping certificate or warehouse receipt must be endorsed by the holder making the delivery, and transfer as specified above constitutes endorsement. Such endorsement shall constitute a warranty of the genuineness of the certificate or receipt and of good title thereto, but shall not constitute a guaranty, by an endorser, of performance by the issuer of the certificate or receipt. Such endorsement shall also constitute a representation that all premium, storage, or carrying charges have been paid on the commodity covered by the certificate or receipt, in accordance with the rules of the relevant product chapter.

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INTERPRETATIONS & SPECIAL NOTICES

RELATING TO CHAPTER 7

SOUTH AMERICAN SOYBEAN CONTRACT LOAD-OUT PROCEDURES

The following is a general outline of procedures for the load-out of South American Soybeans (SAB) covered by CBOT registered shipping certificates. The procedures are based on CBOT rules and trade practice as defined by the ANEC 41 Brazilian Soybean F.O.B. contract.

1. Cancellation of a Shipping Certificate

a.—To initiate the load-out process, the certificate holder, or owner, requests his clearing-firm to cancel the shipping certificate for load out purposes using the electronic form provided by the Clearing-House's online system. Once a shipping certificate has been cancelled for load out purposes, it may not be re-issued. (The Registrar will bill the owner's clearing firm a cancellation fee per certificate.) Note: At the sole discretion of the CBOT Registrar, certificates may be reissued if an error was made in identifying certificates that were to be cancelled for load out purposes and if the request is made within 2 business days of when the certificates were cancelled.

b. CBOT Shipping Certificate carrying charges: CBOT shipping certificate carrying charges will cease once the shipping certificate has been cancelled for load out purposes.

c. The owner of the shipping certificates is obligated to give the regular firm a vessel nomination within two business days following the cancellation of the certificate.

d. The regular firm, at its sole option, may require the owner of the cancelled shipping certificates to pay, at this time, the CBOT shipping certificate carrying charges that have accumulated up to, and including, the date the shipping certificates were cancelled for load out purposes. The regular firm or its agent shall accept payment of funds in the form of a wire transfer during normal business hours based on Chicage time.

e. Upon cancellation of the shipping certificates in the delivery system, the regular firm shall issue a standard ANEC 41 Contract (January 1, 2005 version) to the owner of the cancelled shipping certificates within three business days. The contract will provide for a thirty-day shipment period commencing on the day the shipping certificates were cancelled. The regular firm and owner of the shipping certificates must exchange executed copies of the ANEC 41 contract within three business days after the owner receives the contract from the regular firm.

f. The payment section of ANEC-41, Paragraph 5, Line 39 shall state "CBOT SOUTH AMERICAN SOYBEAN SHIPPING CERTIFICATES" "CASH PRICE ON DATE OF CANCELLATION WAS ______". This clause reflects the fact that payment for the shipping certificates has been effected through the Chicago Board of Trade electronic delivery process. The cash price stated in this section of the ANEC-41 contract shall be mutually agreed to by the owner and the regular firm and will be the basis for settling weight and quality variations.

2. Submission of Vessel Nomination

a. The shipping certificate owner must provide directly to the regular firm or to its representative agent in Chicage, a vessel nomination in writing and consistent with ANEC 41 procedures. The vessel nomination will contain the following items of information: name of vessel, age of vessel, flag of vessel, owner of vessel, demurrage/despatch rate per vessel charter party, vessel estimated time of arrival at port ("ETA"), loading port, and destination of carge (the physical soybeans representing the cancelled shipping certificates). The agent referenced herein must be a clearing member of the CBOT, be located in the vicinity of the CBOT and be available during business hours (except Exchange holidays). Business hours are 8:00 a.m. 4:30 p.m., Monday-Friday, Chicage Time.

b. -Vessel nomination must be issued no later than two business days after shipping certificates are cancelled. Note: The owner of shipping certificates may not cancel the certificates unless a suitable vessel has been booked and the owner is prepared to issue a vessel nomination within two business days following the cancellation of shipping certificates.

c.---The shipping certificate owner must provide directly to the regular firm or to its representative agent in Chicage, a valid Notice of Vessel Readiness to load (NOR) as per ANEC 41, Paragraph 9.2G.

d. Extension and ANEC 41 Carrying charges: Shipment extension and ANEC 41 carrying charges as per ANEC 41, Paragraph 10A through 10E. Section 10A specifies "If nominated vessel arrives/tenders a valid Notice of Readiness by 17:00 hours [São Paulo time] of the last day of the shipment period, carrying

charges are not-due, even if goods are loaded after shipment period. Otherwise carrying charges will be due until shipment date."

e. Load Rate, Time to Count, and Despatch/Demurrage: The average daily load rate is 2,000 metric tons per day per self trimming bulk carrier as per ANEC 41, Paragraph 9.2 A., or 1,500 metric tons for a non-self trimming bulk carrier as per ANEC 41, Paragraph 9.2B, or 1,200 metric tons for a non-bulk carrier as per ANEC 41, Paragraph 9.2B, or 1,200 metric tons for a non-bulk carrier as per ANEC 41, Paragraph 9.2B, or 1,200 metric tons for a non-bulk carrier as per ANEC 41, Paragraph 9.2B, or 1,200 metric tons for a non-bulk carrier as per ANEC 41, Paragraph 9.2B, or 1,200 metric tons for a non-bulk carrier as per ANEC 41, Paragraph 9.2B, or 1,200 metric tons for a non-bulk carrier as per ANEC 41, Paragraph 9.2C. Time will start upon receipt by the regular firm or its agent of the Notice of Readiness but will in no case be less than the fifteen days preadvice period which commences when vessel nomination is given. Time to count for the purposes of the load rate will be as specified in ANEC 41, Paragraph 9.2E. Despatch/demurrage is to be indicated to the regular firm at the time of vessel nomination but must be a minimum of U.S.\$2,500/5,000 respectively, as per ANEC 41, Paragraph 9.2F.

3. Request for Grain Inspection or Additional Stevedoring Service

a. The owner may request, at his option and expense, a joint survey per the provisions of ANEC 41.

b. All fees for stevedoring services to load soybeans into vessels are to be paid by the regular firm.

4.__Actual Load-Out

a. The regular firm shall transmit to the Registrar daily by 11:00 hours São Paulo time, the name, ETA, and expected tennage of any and all vessels that have been nominated to the regular firm in order to load out soybeans. The regular firm must advise the Registrar and the owner of the cancelled shipping certificates of the best available estimate of when the vessel is expected to load. It is the obligation of the regular firm to update the Registrar and the owner when new information is available.

b. The regular firm must advise the Registrar and the owner of the cancelled shipping certificates of any load-out difficulties, including but not limited to inclement weather, labor problems, intervention by local authorities, and any situation that may be considered a force majoure. This notification shall be in writing and within 24 hours of when the condition of impossibility began.

c. The owner of shipping certificates has an obligation to be familiar with the terms and conditions of ANEC 41, and the prevailing policies of the Port Authority of Paranagua, as well as those of Brazilian State and Federal agencies exercising authority over the export of soybeans and operations of export facilities.

5. Final Settlement of All-Charges by Invoice

a. The regular firm shall present the documents listed in ANEC 41, Paragraph 11A, 11B, and 11C to the owner within four business days of completion of loading as per ANEC 41, Paragraph 11.1. In the event the Bills of Lading have not been submitted to the Shipper within 2 business days of when the Bills of Lading were due, the buyer shall pay the Seller interest on the outstanding balance owed to the Shipper since payment for the shipping certificates was made via the futures delivery process.

b. The owner pays the regular firm, upon the completion of leading, all extension carrying charges and despatch that may be due. Failure to pay charges consistent with ANEC 41 may subject the buyer to the ANEC arbitration process as per ANEC 41, Paragraph 16.

c. The regular firm must pay any demurrage due to the owner consistent with the terms and conditions of ANEC 41. Failure to pay charges consistent with ANEC 41 may subject the regular firm to the ANEC arbitration process as per ANEC 41, Paragraph 16 and Paragraph 17.

d. Failure to perform the duties prescribed herein may be deemed an act detrimental to the welfare of the Exchange.-

The outline provided above is intended to serve only as a general guide to grain load-out procedures which are subject to the rules of the CBOT and the contract terms of ANEC 41. Certain of the discussed obligations of the regular firm and owners may not apply in a particular situation or may be open to negotiation between the parties. Care has been taken in the proparation of this outline, but there is no warranty or representation expressed or implied by the CBOT as to the accuracy or completeness of the material herein. In particular, CBOT rules may be revised from time to time. Accordingly, current rules, if applicable, should be consulted when there is a question about load-out. Please be advised that other laws may also apply to, or govern, a particular situation. If you have legal questions concerning load-out, the Exchange recommends that you consult your legal counsel.

LETTER OF CREDIT AND BOND STANDARDS

1. LETTER OF CREDIT STANDARDS FOR CORN, OATS, WHEAT, SOYBEANS, SOUTH AMERICAN SOYBEANS AND ETHANOL

CBOT Rule 703 and other CBOT rules require, as a condition for regularity, that issuers of shipping certificates for certain commodities must file a bond and/or designated letter of credit with sufficient sureties in such sum and subject to such conditions as the Exchange may require. The Exchange has determined that the following requirements shall apply to such letters of credit.

a. The regular firm is required to secure a letter of credit, naming the Board of Trade of the City of Chicago, Inc. as its beneficiary, for 100% (120% for South American Soybeans) of the current market value of the shipping certificates issued. The address of the primary office for the presentation of demand must be located in the United States.

b. The regular firm is required to monitor the value of the outstanding certificates issued using the futures spot month settlement price. Whenever the amount of the letter of credit falls below 80% (100% for South American Soybeans) of the current market value for certificates issued, the regular firm must increase the amount of the letter of credit, or obtain a new letter of credit, for an amount equal to 100% (120% for South American Soybeans) of the current market value of outstanding certificates, by 5:00 p.m. (Chicago Time) on the first business day following the relevant futures settlement.

c. Prior to additional shipping certificates being issued, the regular firm must increase the amount of the letter of credit, or secure a new letter of credit, for 100% (120% for South American Soybeans) of the current market value of all shipping certificates which are outstanding as well as all shipping certificates which will be issued.

d. The Exchange will accept letters of credit only from banks with a Moody's Investor Service counter party credit rating of A or above or a Standard and Poor's short-term counter party rating not lower than A-2.

e. The letter of credit must be irrevocable, it must provide for payment within the time specified by the Exchange, and it must be able to be drawn upon unconditionally.

f. The letter of credit must be in the form approved by the Exchange.

g. The expiration date of a letter of credit may not occur during any relevant futures delivery cycle.

2. LETTER OF CREDIT STANDARDS FOR ALL OTHER AGRICULTURAL PRODUCTS

CBOT Rule 703 and other CBOT rules require, as a condition for regularity, that warehousemen for agricultural commodities other than corn, wheat, soybeans, South American Soybeans, and ethanol must file a bond and/or designated letter of credit with sufficient sureties in such sum and subject to such conditions as the Exchange may require. The Exchange has determined that the following requirements shall apply to such letters of credit.

a. The regular firm is required to secure a letter of credit, naming the Board of Trade of the City of Chicago, Inc. as its beneficiary, for such sum and subject to such conditions as the Exchange may require. The address of the primary office for the presentation of demand must be located in the United States.

b. The Exchange will accept letters of credit only from banks with a Moody's Investors Service counterparty credit rating of A or above or a Standard and Poor's short-term counterparty rating not lower than A-2.

c. The letter of credit must be irrevocable, must provide for payment within the time specified by the Exchange, and must be able to be drawn upon unconditionally.

d. The letter of credit must be in the form approved by the Exchange.

e. The expiration date of a letter of credit may not occur during any relevant futures delivery cycle.

3. BOND STANDARDS FOR ALL OTHER AGRICULTURAL PRODUCTS

CBOT Rule 703 and other CBOT rules require, as a condition for regularity, that warehousemen for agricultural commodities other than corn, wheat, soybeans, South American Soybeans, and ethanol must file a bond and/or designated letter of credit with sufficient sureties in such sum and subject to such conditions as the Exchange may require. The Exchange has determined that the following requirements shall apply to such bonds.*

a. The warehouseman is required to secure a bond naming the Board of Trade of the City of Chicago, Inc. as its beneficiary for such sum and subject to such conditions as the Exchange may require.

b. The bond must be in the form approved by the Exchange.

c. The Exchange will accept bonds only from insurance companies that have been rated by one of the following rating agencies: AM Best, Standard & Poor's, or Moody's Investor Service. The following are the minimum credit ratings that are acceptable.

1. AM Best: B++

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- 2. Standard & Poor's: A-
- 3. Moody's Investor Service: A3

* The Exchange will continue to accept USDA bonds in order for warehousemen to meet bonding requirements for Oats, and Rice. If the amount specified on the USDA bond does not meet the Exchange's requirements, an additional bond must be issued for the amount that is not covered under the USDA bond. The additional bond must meet the requirements specified in a. through c.

SOUTH AMERICAN SOYBEAN SHIPPING FACILITIES

Warehouse Number	Firm	Clearing Agent	Location of Port	Maximum Certificates	Location Differential
6020	COAMO Agroindustrial Cooperativa	Goldenberg,- Hehmeyer & Co.	Paranagua	1469	PAR
6030	Cargill Agricola, S.A.	Cargill Investor Services, Inc.	Paranagua	1469	PAR
6050	Louis Droyfus Corporation/Comercice Industrias Brasileiras Coinbra, S.A.	Torm Commoditios, Inc.	Paranagua	2204	PAR