



June 16, 2008

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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 OFFICE OF THE SECRETARIAT

RE: DJIA (\$10 multiplier) and the DJIA (\$5 multiplier) futures contracts
 CBOT Submission# 08-62

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commission of amendments to the options on the DJIA (\$10 multiplier) and the DJIA (\$5 multiplier) futures contracts.

The Exchange hereby amends the strike listing rules for the DJIA (\$10 multiplier) and the DJIA (\$5 multiplier) options contracts. The new strike rules adopt procedures that resemble other CME index options products as well as satisfy customer demands for finer strike increments. The table below illustrates the changes with the amended rules following:

Strike Listings	Current	Amended
\$10 Multiplier	Next 20 consecutive higher and the next 20 consecutive lower striking prices closest to the \$10 Dow @ 100 point intervals Next 10 consecutive higher and the next 10 consecutive lower striking prices closest to the \$10 Dow @ 200 point intervals	50 percent of DJIA(\$10 multiplier) @ 100-point intervals 20 percent of DJIA(\$10 multiplier) @ 50-point intervals
\$5 Multiplier	Next 20 consecutive higher and the next 20 consecutive lower striking prices closest to the \$5 Dow @ 100 point intervals Next 10 consecutive higher and the next 10 consecutive lower striking prices closest to the \$5 Dow @ 200 point intervals	50 percent of DJIA(\$5 multiplier) @ 100-point intervals 20 percent of DJIA(\$5 multiplier) @ 50-point intervals

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Page 2 of 7

The text of the rule amendments are attached, with additions underlined and deletions overstruck. The amended strikes listing procedure shall become effective on Sunday, June 22, 2008.

The Exchange certifies that these changes neither violate nor are inconsistent with any provision of the Commodity Exchange Act or of the rules thereunder.

If you require any additional information regarding this action, please contact Lucy Wang, at 312-648-5478 or via e-mail at lucy.wang@cmegroup.com or me. Please reference our CBOT Submission #08-62 in any related correspondence.

Sincerely,

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

Text of Rule Amendments

(Additions are underlined, deletions are bracketed and overstruck.)

Chapter 26A CBOT® Dow Jones Industrial AverageSM Index (\$10 Multiplier) Futures Options

26A01.E. Exercise Prices

~~[Trading shall be conducted for put and call options with striking prices in integral multiples of one hundred index points per CBOT \$10 Dow futures contract and in integral multiples of two hundred index points per CBOT \$10 Dow futures contract as follows:~~

~~1. At the commencement of trading for quarterly and non-quarterly expirations, the following strike prices in one hundred point intervals shall be listed: one with a striking price closest to the previous day's settlement price on the underlying CBOT \$10 Dow futures contract and the next twenty consecutive higher and the next twenty consecutive lower striking prices closest to the previous day's settlement price. If the previous day's settlement price is midway between two striking prices, the closest price shall be the larger of the two. Over time new striking prices will be added to ensure that at least twenty one hundred point striking prices always exist above and below the previous day's settlement price in the underlying futures.~~

~~2. At the commencement of trading for quarterly and non-quarterly expirations, the following strike prices in two hundred point intervals shall be listed: the next ten consecutive higher and the next ten consecutive lower strike prices above and below the strike price band as stipulated in Section 1 of this Rule. Over time new striking prices will be added to ensure that at least ten striking prices in two hundred point intervals always exist above and below the strike price band as stipulated in Section 1 of this Rule.~~

~~3. At the end of each quarterly cycle, the Exchange shall reset every listed month's strike prices to conform with Sections 1 and 2 of this Rule. The newly calculated strike price band will be based on the final settlement price on the last business day of the quarterly cycle of the underlying futures contract. The Exchange will de-list all previously listed strike prices that are not one of the newly calculated strike prices, provided that the strike to be de-listed has neither call nor put open interest.~~

~~4. All new strike prices will be added prior to the opening of trading on the following business day. The Exchange may modify the procedure for the introduction of striking prices as it deems appropriate in order to respond to market conditions.]~~

1. Options in the March Quarterly Cycle

The exercise prices shall be stated in terms of the Dow Jones Industrial Average

Stock Index (\$10 multiplier) futures contract.

A referencing index shall be determined each quarter on the day prior to the expiration of the March Quarterly futures contract and shall equal the daily settlement price of the nearest expiring Dow Jones Industrial Average Stock Index (\$10 multiplier) futures contract. The chosen referencing index will then be used to determine the strike listing range for all listed contract months. The index points are rounded down to the nearest integer.

At the commencement of trading for each contract month, the Exchange shall list all exercise prices in a range of 50 percent of the referencing index above and below the previous day's settlement price of the underlying futures contract that are integers divisible by 100 without remainder, e.g. 12,300, 12,400, 12,500, etc.

Exercise prices that are integers divisible by 50 without remainder shall be added, if they have not already been listed, within a range of 20 percent of the referencing index above and below the previous day's settlement price of the underlying futures contract.

Thereafter, when a settlement price in the underlying futures contract occurs at, or passes through, any exercise price, the Exchange shall add on the next trading day, all eligible exercise prices in the corresponding ranges. New options may be listed for trading up to and including the termination of trading.

2. Options Not in the March Quarterly Cycle

Exercise prices for options not in the March quarterly cycle listed for trading shall be identical to the exercise prices that are listed for the March quarterly options on the same underlying futures contract. For example, the exercise prices listed for the January contract shall be identical to those listed for the March contract.

**Chapter 27A
CBOT® Dow Jones Industrial AverageSM Index
(\$5 Multiplier) Futures Options**

27A01.E. Exercise Prices

~~[Trading shall be conducted for put and call options with striking prices in integral multiples of one hundred index points per CBOT \$5 Dow futures contract and in integral multiples of two hundred index points per CBOT \$5 Dow futures contract as follows:~~

~~1. — At the commencement of trading for quarterly and non-quarterly expirations, the following strike prices in one hundred point intervals shall be listed: one with a striking price closest to the previous day's settlement price on the underlying CBOT \$5 Dow futures contract and the next twenty consecutive higher and the next twenty consecutive lower striking prices closest to the previous day's settlement price. If the previous day's settlement price is midway between two striking prices, the closest price shall be the larger of the two. Over time new striking prices will be added to ensure that at least twenty one hundred point striking prices always exist above and below the previous day's settlement price in the underlying futures.~~

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The exercise prices shall be stated in terms of the Dow Jones Industrial Average Stock Index (\$5 multiplier) futures contract.

A referencing index shall be determined each quarter on the day prior to the expiration of the March Quarterly futures contract and shall equal the daily settlement price of the nearest expiring Dow Jones Industrial Average Stock Index (\$5 multiplier) futures contract. The chosen referencing index will then be used to determine the strike listing range for all listed contract months. The index points are rounded down to the nearest integer.

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