



July 12, 2007

Ms. Eileen Donovan
Acting Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street, N.W.
Washington, D.C. 20581

RE: **Merger of Chicago Mercantile Holdings Inc. and CBOT Holdings, Inc.**

Dear Ms. Donovan:

On July 12, 2007, the merger between Chicago Mercantile Holdings Inc. ("CME Holdings") and CBOT Holdings, Inc. ("CBOT Holdings") was consummated. The new combined company is named CME Group Inc. Chicago Mercantile Exchange Inc. ("CME Inc.") and Board of Trade of the City of Chicago, Inc. ("CBOT Inc.") are wholly-owned subsidiaries of CME Group Inc. and will continue to operate as two separate self-regulatory organizations.

As a result of the merger, the market regulation functions for CME Inc. and CBOT Inc. will be performed by one joint Market Regulation Department. Regulatory services will be provided to CBOT Inc. pursuant to a Regulatory Services Agreement executed by CME Inc. and CBOT Inc. The Regulatory Services Agreement will be sent under separate cover to the Commodity Futures Trading Commission ("Commission").

Pursuant to Commission Rule 38.5(d), CME Group Inc. hereby certifies that CME Inc. and CBOT Inc. currently meet all of the requirements set forth in Sections 5(b) and 5(d) of the Commodity Exchange Act, as amended, and in Part 38 of the Commission's Regulations, as applicable. Further, CME Group Inc. certifies that after the implementation of the Regulatory Services Agreement discussed above, CME Inc. and CBOT Inc. will continue to meet all of the requirements set forth in Sections 5(b) and 5(d) of the Commodity Exchange Act, as amended, and in Part 38 of the Commission's Regulations, as applicable.

Sincerely,

A handwritten signature in cursive script that reads "Stephen Szarmack".

Stephen M. Szarmack
Director and Associate General Counsel

Enc.