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OFFICE OF THE SECRETARIAT

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July 15, 2010

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

**RE: Change Listing Cycle for Corn and Soybean Options
CBOT Submission No. 10-203**

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commodity Futures Trading Commission of its intention to change the listing cycle for CBOT Corn and Soybean options to always include the first three contract expirations. The current listing cycle always includes only the first two contract expirations. This change is being implemented to facilitate the calculation of volatility indexes for Corn and Soybeans. Implementation is planned for trade date August 1, 2010.

CBOT certifies that this action complies with the Commodity Exchange Act and regulations thereunder.

If you require any additional information regarding this action, please contact Fred Seamon, at 312-634-1587 or via e-mail at Fred.Seamon@CMEGroup.com or me at 312-648-5422. Please reference our CBOT Submission No. 10-203 in any related correspondence.

Sincerely,

/s/ Stephen M. Szarmack
Regulatory Counsel

8347

CURRENT CBOT CORN AND SOYBEAN PRODUCTS MONTH OPTIONS CYCLE GUIDE													
COMMODITY	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	
CORN OPTIONS First 2 consecutive months and First 7 or 8 standard option contracts and 3 Dec and preceding Jul	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	
	MAR	<u>APR</u>	MAY	<u>JUN</u>	JUL	<u>AUG</u>	SEP	<u>OCT</u>	<u>NOV</u>	DEC	JAN	<u>FEB</u>	
	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar	Mar	Mar	
	Jul	Jul	Sep	Sep	Dec	Dec	Mar	Mar	Mar	May	May	May	
	Sep	Sep	Dec	Dec	Mar	Mar	May	May	May	Jul	Jul	Jul	
	Dec	Dec	Mar	Mar	May	May	Jul	Jul	Jul	Sep	Sep	Sep	
	Mar	Mar	May	May	Jul	Jul	Sep	Sep	Sep	Dec	Dec	Dec	
	May	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Dec	Mar	Mar	
	Jul	Jul	Dec	<u>Sep</u>	Dec	Dec	Dec	Jul	<u>Mar</u>	Mar	<u>May</u>	May	May
	Dec	Dec	Jul	Dec	Jul	Jul	Jul	Dec	Jul	Jul	Jul	Jul	Jul
	Jul	Jul	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec
	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	<u>Jul</u> <u>Dec</u>
	SOYBEAN OPTIONS First 2 consecutive months and First 9 standard option contracts	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN
MAR		<u>APR</u>	MAY	<u>JUN</u>	JUL	AUG	SEP	<u>OCT</u>	NOV	<u>DEC</u>	JAN	<u>FEB</u>	
May		May	Jul	Jul	Aug	Sep	Nov	Nov	Jan	Jan	Mar	Mar	
Jul		Jul	Aug	Aug	Sep	Nov	Jan	Jan	Mar	May	May	May	
Aug		Aug	Sep	Sep	Nov	Nov	Jan	Mar	Mar	May	May	Jul	
Sep		Sep	Nov	Nov	Jan	Jan	Mar	May	May	Jul	Jul	Aug	
Nov		Nov	Jan	Jan	Mar	Mar	May	Jul	Jul	Aug	Aug	Sep	
Jan		Jan	Mar	Mar	May	May	Jul	Jul	Aug	Sep	Sep	Nov	
Mar		Mar	May	May	Jul	Jul	Aug	Aug	Sep	Nov	Nov	Nov	
<u>May</u>		May	<u>Jul</u>	Jul	<u>Aug</u>	Aug	Aug	<u>Sep</u>	<u>Nov</u>	<u>Jan</u>	Jan	Jan	Jan
May		May	Jul	Jul	Aug	Aug	Aug	Aug	Aug	Nov	Nov	Nov	
Jul		Jul	Aug	Aug	Sep	Sep	Sep	Sep	Sep	Nov	Nov	Nov	
Aug		Aug	Sep	Sep	Nov	Nov	Nov	Nov	Nov	Jan	Jan	Jan	

Note: Contract months that are bold and underlined indicate that the contracts were added during the previous month on the first business day following an option expiration. Therefore, the contracts are listed by the first day of the month indicated at the top of the column. Months listed in SMALL CAPPS indicated reduced strike price intervals.

NEW CBOT CORN AND SOYBEAN PRODUCTS MONTH OPTIONS CYCLE GUIDE												
COMMODITY	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
CORN OPTIONS First 3 consecutive months and First 7 or 8 standard option contracts and 3 Dec and preceding Jul	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN
	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB
	<u>APR</u>	MAY	<u>JUN</u>	JUL	<u>AUG</u>	SEP	<u>OCT</u>	<u>NOV</u>	DEC	<u>JAN</u>	<u>FEB</u>	MAR
	May	Jul	Jul	Sep	Sep	Dec	Dec	Dec	Mar	Mar	Mar	May
	Jul	Sep	Sep	Dec	Dec	Mar	Mar	Mar	Mar	May	May	Jul
	Sep	Dec	Dec	Mar	Mar	May	May	May	Jul	Jul	Jul	Sep
	Dec	Mar	Mar	May	May	Jul	Jul	Jul	Sep	Sep	Sep	Dec
	Mar	May	May	Jul	Jul	Sep	Sep	Sep	Dec	Dec	Dec	Mar
	May	Jul	Jul	<u>Sep</u>	Sep	Dec	Dec	Dec	Mar	Mar	Mar	May
	Jul	Dec	Dec	Dec	Dec	Dec	Jul	Jul	<u>Mar</u>	Jul	<u>May</u>	Jul
	Dec	Jul	Jul	Jul	Jul	Jul	Dec	Dec	Jul	Dec	Jul	Dec
	Jul	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	Dec	<u>Jul</u> <u>Dec</u>
	SOYBEAN OPTIONS First 3 consecutive months and First 9 standard option contracts	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
MAR		APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB
<u>APR</u>		MAY	<u>JUN</u>	JUL	AUG	SEP	<u>OCT</u>	NOV	<u>DEC</u>	JAN	<u>FEB</u>	MAR
May		Jul	Jul	Aug	Sep	Nov	Nov	Jan	Jan	Mar	Mar	May
Jul		Aug	Aug	Sep	Nov	Jan	Jan	Mar	Mar	May	May	Jul
Aug		Sep	Sep	Nov	Jan	Mar	Mar	May	May	Jul	Jul	Aug
Sep		Nov	Nov	Jan	Mar	May	May	Jul	Jul	Aug	Aug	Sep
Nov		Jan	Jan	Mar	May	Jul	Jul	Aug	Aug	Sep	Sep	Nov
Jan		Mar	Mar	May	Jul	Jul	Aug	Aug	Sep	Sep	Nov	Jan
Mar		May	May	Jul	<u>Aug</u>	Aug	Aug	<u>Sep</u>	<u>Nov</u>	Nov	Jan	Jan
<u>May</u>			<u>Jul</u>							<u>Jan</u>		<u>Mar</u>

Note: Contract months that are bold and underlined indicate that the contracts were added during the previous month on the first business day following an option expiration. Therefore, the contracts are listed by the first day of the month indicated at the top of the column. Months listed in SMALL CAPPS indicated reduced strike price intervals.