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OFFICE OF THE SECRETARIAT
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August 26, 2009

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

**RE: CBOT Rules 14B05, 14B06 and 14B08
Update Mini-Sized Wheat Futures Rules for Consistency with Wheat
Futures
CBOT Submission No. 09-176**

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commodity Futures Trading Commission that it has identified inconsistent language in the rules for CBOT Mini-Sized Wheat futures compared to CBOT Wheat futures. Last December, the CFTC approved changes to premium charges, delivery territories, and vomitoxin requirements in CBOT Wheat futures markets. The premium charges and additional delivery territories were implemented with the July 2009 contract and the vomitoxin changes will be implemented with the September 2009 contract. All of these changes have also been implemented with respect to the Mini-Sized Wheat futures contract. However, the Mini-Sized Wheat futures rulebook chapter has not been updated with the premium charge and delivery territory changes.

These changes have been incorporated in the Mini-Sized Wheat futures market. Mini-Sized Wheat futures spreads are consistent with the full-sized contract indicating that the storage charge increases incorporated in the July 2009 expiration have also been incorporated in the Mini-Sized Wheat market. Also, delivery between the Mini-Sized Wheat contract and the full-sized contract is fungible. Mini-Sized shipping certificates cannot be loaded-out by themselves, but must be converted to full-sized shipping certificates for load out. Thus, the mini-sized contract by definition has the same delivery points as the full-sized contract.

The corrections are attached with additions **bold and underscored** and deletions [~~bracketed with strikethrough~~].

CBOT certifies that these changes comply with the Commodity Exchange Act and regulations thereunder. The amendments will be made effective immediately.

If you require any additional information, please contact David Lehman at 312-930-1875 or via e-mail at David.Lehman@cmegroup.com; Fred Seamon at 312-634-1587 or via e-mail at Fred.Seamon@cmegroup.com; or contact me 312-648-5422. Please reference our CBOT Submission No. 09-176 in any related correspondence.

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Sincerely,

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

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14B05. LOCATION DIFFERENTIALS

In accordance with the provisions of Rule 14B06., wheat for shipment from regular facilities located within the Chicago Switching District, the Burns Harbor, Indiana Switching District, on the Ohio River, or the Toledo, Ohio Switching District may be delivered in satisfaction of mini-sized Wheat futures contracts at contract price, subject to the differentials for class and grade outlined above. Wheat for shipment from regular facilities in the Northwest Ohio territory may be delivered in satisfaction of mini-sized Wheat futures contracts at a discount of 20 cents per bushel, subject to the differentials for class and grade outlined above. Wheat for shipment from regular facilities on the Mississippi River may be delivered in satisfaction of mini-sized Wheat futures contracts at a premium of 20 cents per bushel, subject to the differentials for class and grade outlined above. Only No. 1 Soft Red Winter and No. 2 Soft Red Winter Wheat for shipment from regular facilities located within the St. Louis-East St. Louis and Alton Switching districts may be delivered in satisfaction of mini-sized Wheat futures contracts at a premium of 10 cents per bushel over contract price, subject to the differentials for class and grade.

14B06. DELIVERY POINTS

Wheat shipping certificates shall specify shipment from one of the currently regular for delivery facilities located in one of the following territories:

Wheat for shipment from regular facilities located within the Chicago Switching District, the Burns Harbor, Indiana Switching District, the Northwest Ohio Territory, on Ohio River, on Mississippi River or the Toledo, Ohio Switching District may be delivered in satisfaction of mini-sized wheat futures contracts. Only No. 1 Soft Red Winter and No. 2 Soft Red Winter Wheat for shipment from regular facilities located within the St. Louis-East St. Louis and Alton Switching Districts may be delivered in satisfaction of mini-sized Wheat futures. When used in these Rules, Burns Harbor, Indiana Switching District will be that area geographically defined by the boundaries of Burns Waterway Harbor at Burns Harbor, Indiana which is owned and operated by the Indiana Port Commission. The Northwest Ohio Territory shall be shuttle loading facilities within the following 12 counties: Allen, Crawford, Hancock, Hardin, Henry, Huron, Marion, Putnam, Sandusky, Seneca, Wood, and Wyandot. The Ohio River facilities shall be river loading facilities on the Ohio River from mile marker 455 to the Mississippi River. The Mississippi River facilities shall be river loading facilities on the Mississippi River downriver from the St. Louis-East St. Louis Alton Switching District to mile marker 715.

14B08. PREMIUM CHARGES

To be valid for delivery on futures contracts, all certificates covering mini-sized wheat under obligation for shipment must indicate the applicable premium charge. No certificate shall be valid for delivery on futures contracts unless the premium charges on such wheat shall have been paid up to and including the 18th calendar day of the preceding month, and such payment is endorsed on the certificate. Unpaid accumulated premium charges at the posted rate applicable to the facility shall be allowed and credited to the buyer by the seller up to and including date of delivery.

The premium charges on mini-sized Wheat shall not exceed 26.5/100 of one cent per bushel

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per day during the period from July 18 through December 17. The premium charges on mini-sized Wheat shall not exceed 16.5/100 of one cent per bushel per day during the period from December 18 through July 17.