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OFFICE OF THE SECRETARIAT  
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September 22, 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 Rule 8F15 ("Trade Submission on CME ClearPort")  
CME Submission No. 09-209**

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission ("Commission") of amendments to CME Rule 8F15 ("Trade Submission on CME ClearPort"). These rule changes are designed to harmonize the trade submission procedures on ClearPort with other ClearPort-related rules. The rule amendments will be made effective immediately.

CME certifies that these changes comply with the Commodity Exchange Act and regulations thereunder.

If you have any questions regarding these changes, please contact me at 312.648.5422.

Sincerely,

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

## 8F15. TRADE SUBMISSION ON CME CLEARPORT

A. This rule governs all OTC Derivatives that the Clearing House has designated as eligible for clearing that are submitted for clearing via the CME Clearport and that are not extinguished and replaced by positions in regulated futures and options ("Transactions"). The parties to a Transaction and any person authorized under Section C of this Rule with brokering capability ("Broker" or "Brokers") must comply with applicable registration procedures for participation in CME Clearport and must continue to comply with applicable registration procedures for OTC Derivatives, as may be amended from time to time. Transactions are also subject to the other rules in this chapter.

B. Each Transaction must be submitted in accordance with the procedures established by the Clearing House for this purpose, as amended from time to time. The parties to a Transaction and any Brokers authorized to submit Transactions on such a party's behalf to the Clearing House and authorized for related activities shall be exclusively responsible, both individually and jointly, for accurately confirming the details of the Transaction to the Clearing House. ~~Neither the Clearing House nor a Clearing Member carrying the account of either party will have any responsibility in the confirmation of trade terms for Transactions. Once submitted, all Transactions, subject to the rules for trade adjustments set forth in Section E of this rule, shall be deemed final. Neither the Clearing House nor a Clearing Member carrying the account of either party will have any responsibility in the confirmation of trade terms for Transactions.~~

C. Each Clearing Member must register with the Clearing House staff in the manner required for any customer authorized by the Clearing Member to submit transactions to the Clearing House pursuant to this rule, and must also register with the Clearing House staff the applicable account numbers for each such customer. For each such account, the Clearing Member carrying that account also must submit to the Clearing House staff in the manner provided the name of any Broker who has registered with Clearing House staff for services provided under this rule, and who is authorized by the customer to act on its behalf in the submission of Transactions pursuant to this rule and related activity. For any such Brokers authorized by the customer and submitted to Clearing House staff by the Clearing Member, such submission to the Exchange of the Broker's information by the Clearing Member will not constitute an endorsement or ratification of the customer's authorization of the Broker. Moreover, submission of a Broker authorized by a customer will not mean that the Clearing Member is in privity with, has a relationship with or is otherwise standing behind any of the customer's authorized Brokers, and the Clearing Member will have no responsibility for any such Brokers selected by the customer and no duty or obligation to supervise the activities of any such Brokers.

~~D. CPC Transactions that are submitted and accepted for clearing prior to 4:15 p.m. Chicago time on an Exchange business day will be included by the Clearing House for clearing for that business day. The Exchange reserves the right to modify these business hours without notice at any time. The CME ClearPort Facilitation Desk will generally be available to assist users 24 hours a day on all Exchange business days. For each account number that has been registered with the Clearing House pursuant to Section C of this rule, a Clearing Member also must input into a credit limit check system authorization indicating the specific commodities for which a Transaction may be submitted to the Clearing House pursuant to this rule and the risk value(s) assigned by the Clearing Member for Transactions for that account.~~

~~E. Following submission of the trade details to the Clearing House, a confirmation will be transmitted to the parties to the Transaction notifying them that they have been listed as counterparties in a Transaction that has been submitted to the Clearing House. Following such submission, a buyer or seller may not unilaterally reject the trade terms previously submitted to the Clearing House. However, in order to correct an error resulting from the good-faith actions of a Broker or Clearing House staff, as applicable, and upon mutual consent of the parties to the Transaction, Broker or the Clearing House, as applicable, may void the transaction provided, however, that this void response is received by the Clearing House within sixty (60) minutes of the time of the initial submission of the CPC Transaction to the Clearing House.~~

~~In addition, for an interim period and until notified otherwise by Clearing House staff, Clearing House staff may need to conduct a manual check after the issuance of the original email to confirm that the parties to a Transaction in an OTC Derivative have met all applicable registration requirements for such~~

contracts. Consequently, it may be necessary for Clearing House staff to reject a trade subsequent to such email because one or more of the parties to the Transaction have not qualified to participate in use of CME Clearport for these contracts.

F. For a Transaction submitted to the Clearing House pursuant to this rule, such transaction first will be routed to a credit limit check system. The time of entry of a Transaction into the credit limit check system will be recorded by the system and will be used by the Clearing House as the time that a credit limit check was conducted pursuant to Section G below.

G. The Clearing House will conduct a credit limit check for each Transaction. The credit limit check will confirm whether the Clearing Member carrying that account has authorized that account for CPC Transactions submitted pursuant to this rule, and confirm whether the entry of the Transaction into clearing would fall within the risk value(s) established by the Clearing Member.

At all times until both sides (buy and sell) of the Transaction have successfully cleared a credit limit check, a transaction submitted to the Clearing House pursuant to this rule shall remain as an uncleared transaction. In the event that either side of a CPC Transaction is rejected as a result of the credit limit check test, the parties to the transaction and their respective Clearing Members will be informed accordingly. Thereafter, any determination as to further action with respect to the Transaction will be resolved by the parties to the Transaction.

H. Transactions that are submitted, confirmed and accepted for clearing, as further provided by Section I of this rule, prior to 4:15 p.m. Chicago time on an Exchange business day will be included by the Clearing House for clearing for that business day. The Exchange reserves the right to modify these business hours without notice at any time. The facilitation desk will generally be available to assist users 24 hours a day on all Exchange business days.

I. Upon clearance by both sides of a Transaction of the credit limit check, the transaction shall be deemed to have been accepted for clearing and will be routed automatically to the Clearing House's clearing system.

Notwithstanding the above, a Clearing Member also shall be responsible for accepting and clearing a position for a Transaction entered into the Clearing House's clearing system for clearing following any non-operation of the credit limit-functionality for the applicable account carried by the OTC Clearing Member.