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OFFICE OF THE SECRETARIAT
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141 West Jackson, Suite 2240
Chicago, Illinois 60604

dhorwitz@onechicago.com

September 30, 2009

Mr. David Stawick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Security Futures Products Rule Submission and Rule Certification

Dear Mr. Stawick:

On behalf of OneChicago, LLC ("OCX" or "Exchange"), and pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and section 41.24 of the regulations promulgated by the Commission under the Act, submitted herewith are rule amendments to **OCX Rules 414 - Position Limits, Rule 716 - Position Limit Violations, Rule 902 - Contract Specifications, and Rule 905 - Form of Specifications Supplement** all of which relate to the addition of a position accountability rule.

Originally, in November 2002, OCX Rules 414, 716 and other rules relating to position limits, were adopted by the Exchange as a result of the Commission's approval of final rules regarding Listing Standards and Conditions for Trading Security Futures Products and the adoption of Regulation 41.25 (a)(3)(i)(B).¹ While Rule 41.25 provides for the adoption, by an exchange, of a position accountability rule, OCX did not believe that such a rule was necessary at that time. Now, as the Exchange has matured, we believe that adopting such a rule would be consistent with OCX's responsibilities as a Designated Contract Market. Additionally, OCX is further amending Rule 414 (b) by removing the word "automatically" from the phrase "automatically be exempt from the position limits." This change will eliminate any inconsistencies by making it clear that for an exemption both the filing of an application and the approval of the Exchange are required.

Accordingly, OCX is amending Rules 414 and 716 and other related rules, to provide a position accountability rule for those products where the average daily volume

¹ 66 Fed. Reg. 212 at pg. 55078 (Nov. 1, 2001).

together with the number of outstanding shares significantly reduces the chances for market-manipulation.

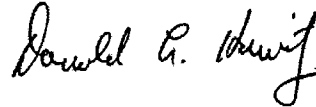
The proposed rule changes are included as Attachment A. Any deletions are marked by a strikethrough (~~xxx~~) and additions are underlined (___).

This Rule amendment will be effective on October 15, 2009.

There are no opposing views that are not incorporated into this rule amendment.

On behalf of OCX, I hereby certify that the amendment complies with the Act and the regulations promulgated thereunder.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald L. Horwitz". The signature is written in a cursive style with a large, stylized initial 'D'.

Donald L. Horwitz
Managing Director and General Counsel

Encl: Attachment A

Position Limits, Position Accountability and Price Limits

414. Position Limits and Position Accountability

(a) Position limits and position accountability shall be as established by the Exchange from time to time as permitted by Commission Regulation § 41.25 and as set forth in Schedule A to Chapter 4. Such position limits and position accountability may be specific to a particular Contract or delivery month or may be established on an aggregate basis among Contracts or delivery months. Except as specified in paragraph (b) below, no Clearing Member, Exchange Member or Access Person shall control, or trade in, any number of Contracts that exceed any position limits and position accountability so established by the Exchange. Except as specified in paragraph (b) below, no Clearing Member, Exchange Member or Access Person shall be permitted to enter into any transaction on the Exchange that would cause such Clearing Member, Exchange Member or Access Person to exceed any position limits or position accountability rules.

(b) Upon application to the Exchange in accordance with paragraph (c) below and the subsequent approval by the Exchange, qualified hedge transactions shall ~~automatically~~ be exempt from the position limits. For purposes of this Rule 414, the term “qualified hedge transaction” shall include any transaction or position in a particular Contract that represents a substitute for transactions to be made or positions to be taken at a later time in the commodity underlying such Contract, provided the transaction entered into or position taken on the Exchange is economically appropriate to reduce risks arising from:

(i) - (iv) [No changes.]

(c) - [No changes.]

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(d) In determining whether any Clearing Member, Exchange Member or Access Person has exceeded the position limits established by the Exchange, all positions in accounts for which such Clearing Member, Exchange Member or Access Person, by power of attorney or otherwise, directly or indirectly controls trading (whether on a proprietary basis or on behalf of Customers) shall be included. Position limits and position accountability shall apply to positions held by two or more Clearing Members, Exchange Members or Access Persons acting pursuant to an express or implied agreement or understanding in the same manner as if such positions were held by a single Person. The Exchange shall have the authority to review and rescind any exemption granted by it pursuant to paragraph (c) above at any time in its sole discretion.

(e)- (f) [No changes.]

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Schedule A to Chapter 4

Symbol	Security Name	Futures Symbol	POSITION LIMIT*	POSITION ACCOUNTABILITY**
AA	ALCOA INC	AA1C		22,500
AAPL	APPLE INC	AAPL1C	22,500	
AIG	AMERICAN INTERNATIONAL GROUP	AIG1C	22,500	
AMAT	APPLIED MATERIALS INC	AMAT1C	22,500	
AMD	ADVANCED MICRO DEVICES	AMD1C	22,500	
AXP	AMERICAN EXPRESS CO	AXP1C	22,500	
BAC	BANK OF AMERICA CORP	BAC1C		22,500
BRCD	BROCADE COMMUNICATIONS SYS	BRCD1C	22,500	
C	CITIGROUP INC	C1C		22,500
CHK	CHESAPEAKE ENERGY CORP	CHK1C	22,500	
CIT	CIT GROUP INC	CIT1C		22,500
CMCSA	COMCAST CORP-CL A	CMCSA1C	22,500	
COF	CAPITAL ONE FINANCIAL CORP	COF1C	22,500	
CSCO	CISCO SYSTEMS INC	CSCO1C		22,500
DELL	DELL INC	DELL1C	22,500	
DIA	DIAMONDS TRUST SERIES I	DIA1C	22,500	
DOW	DOW CHEMICAL	DOW1C	22,500	
DRYS	DRYSHIPS INC	DRYS1C	22,500	
EBAY	EBAY INC	EBAY1C	22,500	
EEM	ISHARES MSCI EMERGING MKT IN	EEM1C		22,500
EFA	ISHARES MSCI EAFE INDEX FUND	EFA1C	22,500	
EMC	EMC CORP/MASS	EMC1C	22,500	
ETFC	E*TRADE FINANCIAL CORP	ETFC1C		22,500
EWJ	ISHARES MSCI JAPAN INDEX FD	EWJ1C	22,500	
EWT	ISHARES MSCI TAIWAN INDEX FD	EWT1C	22,500	
EWZ	ISHARES MSCI BRAZIL	EWZ1C	22,500	
F	FORD MOTOR CO	F1C		22,500
FCX	FREEMPORT-MCMORAN COPPER	FCX1C	22,500	
FITB	FIFTH THIRD BANCORP	FITB1C	22,500	
FNM	FANNIE MAE	FNM1C		22,500
FRE	FREDDIE MAC	FRE1C	22,500	
FXI	ISHARES FTSE/XINHUA CHINA 25	FXI1C	22,500	
GE	GENERAL ELECTRIC CO	GE1C		22,500
GLW	CORNING INC	GLW1C	22,500	
GNW	GENWORTH FINANCIAL INC-CL A	GNW1C	22,500	
GS	GOLDMAN SACHS GROUP INC	GS1C	22,500	
HAL	HALLIBURTON CO	HAL1C	22,500	
HBAN	HUNTINGTON BANCSHARES INC	HBAN1C	22,500	
HD	HOME DEPOT INC	HD1C	22,500	
HIG	HARTFORD FINANCIAL SVCS GRP	HIG1C	22,500	
HPQ	HEWLETT-PACKARD CO	HPQ1C	22,500	
HST	HOST HOTELS & RESORTS INC	HST1C	22,500	
INTC	INTEL CORP	INTC1C		22,500

IWM	ISHARES RUSSELL 2000	IWM1C		22,500
IYR	ISHARES DJ US REAL ESTATE	IYR1C	22,500	
JAVA	SUN MICROSYSTEMS INC	JAVA1C	22,500	
JPM	JPMORGAN CHASE & CO	JPM1C		22,500
KEY	KEYCORP	KEY1C	22,500	
LOW	LOWE'S COS INC	LOW1C	22,500	
LVS	LAS VEGAS SANDS CORP	LVS1C		22,500
MGM	MGM MIRAGE	MGM1C	22,500	
MO	ALTRIA GROUP INC	MO1C	22,500	
MOT	MOTOROLA INC	MOT1C	22,500	
MRK	MERCK & CO. INC.	MRK1C	22,500	
MS	MORGAN STANLEY	MS1C	22,500	
MSFT	MICROSOFT CORP	MSFT1C		22,500
MTLQQ	MOTORS LIQUIDATION CO	MTLQQ1C		22,500
MU	MICRON TECHNOLOGY INC	MU1C	22,500	
NOK	NOKIA CORP-SPON ADR	NOK1C	22,500	
NVDA	NVIDIA CORP	NVDA1C	22,500	
NWSA	NEWS CORP-CL A	NWSA1C	22,500	
ORCL	ORACLE CORP	ORCL1C	22,500	
PBR	PETROLEO BRASILEIRO S.A.-ADR	PBR1C	22,500	
PFE	PFIZER INC	PFE1C		22,500
PLD	PROLOGIS	PLD1C	22,500	
Q	QWEST COMMUNICATIONS INTL	Q1C	22,500	
QCOM	QUALCOMM INC	QCOM1C	22,500	
QQQQ	POWERSHARES QQQ	QQQQ1C		22,500
RF	REGIONS FINANCIAL CORP	RF1C		22,500
RIMM	RESEARCH IN MOTION	RIMM1C	22,500	
S	SPRINT NEXTEL CORP	S1C		22,500
SGP	SCHERING-PLOUGH CORP	SGP1C	22,500	
SPY	SPDR TRUST SERIES 1	SPY1C		22,500
STI	SUNTRUST BANKS INC	STI1C	22,500	
SYMC	SYMANTEC CORP	SYMC1C	22,500	
T	AT&T INC	T1C	22,500	
TSM	TAIWAN SEMICONDUCTOR-SP ADR	TSM1C	22,500	
TXN	TEXAS INSTRUMENTS INC	TXN1C	22,500	
UNG	US NATURAL GAS FUND LP	UNG1C	22,500	
USB	US BANCORP	USB1C	22,500	
VALE	VALE SA-SP ADR	VALE1C	22,500	
VZ	VERIZON COMMUNICATIONS INC	VZ1C	22,500	
WFC	WELLS FARGO & CO	WFC1C		22,500
WMT	WAL-MART STORES INC	WMT1C	22,500	
X	UNITED STATES STEEL CORP	X1C	22,500	
XLE	ENERGY SELECT SECTOR SPDR	XLE1C	22,500	
XLF	FINANCIAL SELECT SECTOR SPDR	XLF1C		22,500
XOM	EXXON MOBIL CORP	XOM1C	22,500	
YHOO	YAHOO! INC	YHOO1C	22,500	

*Generally, the position limits for single stock futures are no greater than 13,500 contracts net long or short during the last five trading days of an expiring contract month. The products listed here qualify for higher position/accountability limits. See, OCX Rule 414.

** Position Accountability rule:

A person owning or controlling more than a specified number of futures contracts net long or short in all contract months combined shall provide, in a timely fashion, upon request by the exchange, information regarding the nature of the position, trading strategy, and hedging information if applicable.

716. Position Limit and Position Accountability Violations

It shall be the duty of the Business Conduct Committee to enforce the position limits and position accountability rules from time to time set by the Exchange with respect to any Contract. All position limit and position accountability violations shall be handled pursuant to paragraphs (a), (b) and (c) below. A Customer that maintains positions at more than one Clearing Member or, if applicable, Exchange Member or Access Person and exceeds any position limit or position accountability shall be deemed to have waived confidentiality regarding such positions, and the Clearing Members, Exchange Members or Access Persons carrying such positions shall be informed of the required *pro rata* reduction. Any sanction imposed on a Clearing Member or Exchange Member under this Rule 716 may be appealed by such Clearing Member or Exchange Member to the Business Conduct Committee, which may modify or overturn such sanction for good cause shown.

(a) *First Occurrence.* The first occurrence of a position limit or position accountability violation shall result in a warning letter to be issued by the Division. In the case of a Customer that maintains positions at more than one Clearing Member or, if applicable, Exchange Member or Access Person, such Customer, in addition to the Clearing Members, Exchange Members or Access Persons in question, shall be issued a warning letter. The first occurrence of a position limit or position accountability violation shall not be recorded, but a record of the incident shall be maintained.

(b) *First Violation Following a Warning Letter.* The first position limit or position accountability violation within 12 months of the receipt of a warning letter shall constitute a violation of this Rule 716, which shall subject the violator to a cease-and-desist order to be issued by the Division. The record of any orders issued under this paragraph (b) shall become a part of the permanent file of the Exchange.

Any Clearing Member or, if applicable, Exchange Member that is found to be in violation of this Rule 0 with respect to the same Customer (as determined based upon the books of such Clearing Member or Exchange Member) following receipt of a warning letter shall receive an order to cease and desist from further position limit or position accountability violations.

If a Customer that maintains positions at more than one Clearing Member or, if applicable, Exchange Member or Access Person exceeds any position limits or position accountability rule after having received a warning letter for a previous violation of this Rule 0, such Customer shall be issued a second warning letter, with copies sent to the Clearing Members, Exchange Members or Access Persons in question, stating that a third violation will result in a hearing to suspend such Customer's

Access Privileges. In addition, the Clearing Members or Exchange Members in question may be found to have violated position limits or position accountability and be ordered to cease and desist, unless they can demonstrate that they neither knew nor should have known about the violation of position limits or position accountability by their Customer.

(c) [No changes.]

902. Contract Specifications

(a) – (e) [No change.]

(f) *Speculative Position Limit or Position Accountability Rule.* For purposes of Rule 414, the position limit applicable to positions in any Single Stock Future held during the last five trading days of an expiring contract month shall be in accordance with Commission Regulation § 41.25 and Appendix A to Chapter 4.

905. Form of Specifications Supplement

Supplement No. __		
Title of Single Stock Future: _____		
Underlying Security:		
Type of Underlying Security:	[common stock][American Depositary Receipt] [share of exchange traded fund] [trust issued receipt] [share of closed-end management investment company] [other]	
Trading Hours:		
Trading Unit:	_____ shares of the Underlying Security	
Minimum Price Fluctuation:	\$0.01 per share, equal to \$ _____ per Contract	
Legal Width Market:	<u>Common Stock Price</u>	<u>Legal Width</u>
	share price < \$10	\$.25
	\$10 < share price < \$50	\$.50
	\$50 < share price	\$1.00
Position Limit or <u>Position Accountability</u> :	During the last five trading days, _____ Contracts net long or short.	