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October 30, 2008

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

RE: CME Position Limit and Reportable Level Table
CME Submission No. 08-171

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME") hereby notifies the Commission that it will be amending the CME Position Limit and Reportable Level Table in the Interpretations & Special Notices Relating to Chapter 5 section of the CME Rulebook to reflect the addition of Turkish Lira futures and Euro/Turkish Lira Cross Rate futures. As set forth in Submission 08-162 from October 22, CME will submit the launch date and initial contract months for these products at a later date. The update to this Table was inadvertently omitted from Submission 08-162.

The pertinent section of the Table is attached, with additions underlined.

CME certifies that this change complies with the Act and regulations thereunder.

If you have any questions regarding this matter, please contact Robert Sniegowski, Associate Director, Market Regulation Department, at 312.648.5493 or me at 312.648.5422. Please reference CME Submission No. 08-171 in any related correspondence.

Sincerely,

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

POSITION LIMIT AND REPORTABLE LEVEL TABLE

| CONTRACT NAME | Options | SCALE DOWN SPOT MONTH (1) | SCALE DOWN SPOT MONTH (2) | SPOT MONTH | SINGLE MONTH | ALL MONTHS COMBINED | POSITION ACCOUNT ABILITY | REPORTABLE FUT LEVEL | REPORTABLE OPT LEVEL |
|---|---------|---------------------------|---------------------------|------------|--------------|---------------------|--------------------------|----------------------|----------------------|
| CME Foreign Exchange | | | | | | | | | |
| Euro FX/Swiss Franc | Y | | | | | | **6,000 | 25 | 25 |
| Euro FX/Turkish Lira | | | | 2,000 | | | **6,000 | 25 | |
| Swiss Franc/Japanese Yen | | | | | | | **6,000 | 25 | |
| Turkish Lira | | | | 2,000 | | | **6,000 | 25 | |
| <p>*(A) E-mini Euro FX and the E-mini Japanese Yen are deemed to be the equivalent of one-half (.50) of the Euro FX and Japanese Yen contract.</p> <p>* Net futures equivalents (NFE) long or short.</p> <p>** Position Accountability rule: A person owning or controlling more than the specified number of futures or futures equivalent 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.</p> <p>*** Mexican Peso spot month position limits go into effect beginning on the third business day prior to the termination of trading day.</p> | | | | | | | | | |