



November 25, 2008

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

**RE: Section 5c(c)(1), Part 40.6 - Rule Certification  
for Delisting of S&P/GRA Commercial Real Estate Indices Options  
CME Submission 08-194**

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Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the CFTC per the Exchange certification procedure, that the Exchange will delist the S&P/GRA Commercial Real Estate Indices options contracts effective as of December 1, 2008. These include a national composite index, five geographic regional indexes (Northeast, Midwest, Mid-Atlantic South, Pacific West and Desert Mountain West) and four national property type indexes (Office, Warehouse, Apartment and Retail). The S&P/GRA Commercial Real Estate Indices options contracts currently have zero open interest.

The Exchange certifies that this action neither violates nor is inconsistent with any provision of the Commodity Exchange Act or of the rules thereunder.

If you require any additional information regarding this action, please do not hesitate to contact Ms. Lori Aldinger, Associate Director at 312-930-2337 or via e-mail at [lori.aldinger@cmegroup.com](mailto:lori.aldinger@cmegroup.com) or please contact me at (312) 648-5422. Please reference our CME Submission #08-193 on all future correspondence regarding this notification.

Sincerely,

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