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October 3, 2008

2008 OCT -9 PM 2:55

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

OFF. OF THE SECRETARIAT

RE: Implementation of Changes to CBT Wheat Futures Contract

Dear Mr. Stawick:

I am providing comment on the Commodity Futures Trading Commission's Release 5541-08 dated September 9, 2008 regarding the Chicago Board of Trade's request from the Commission to implement rule changes to the CBT wheat futures contract. See a copy of the release below this letter.

I understand that the CBT has recommended three new delivery territories, one that includes elevators located on the Mississippi River between St. Louis and Memphis at a \$.20 per bushel premium. As a large wheat producer from Mississippi whose wheat is tributary to grain elevators on the Mississippi River south of Memphis, I believe I am entitled to the same opportunity to sell my wheat for a competitive price that isn't substantially below the price that wheat producers receive for their wheat just north of me.

For this reason, I would like to see the CBT's recommendation to add barge loading facilities on the Mississippi River from below St. Louis to Memphis expanded to include Mississippi River barge loading facilities below Memphis to Greenville, MS, rather than ending the delivery territory arbitrarily and, in my opinion, unfairly at Memphis.

Sincerely,



Gil Stovall
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Release: 5541-08

For Release: September 9, 2008

CFTC Seeks Public Comment on Request by Chicago Board of Trade to Amend its Wheat Futures Contract

Washington, DC – The Commodity Futures Trading Commission (CFTC) is requesting public comment on proposed amendments submitted by the Chicago Board of Trade (CBT) to its wheat futures contract.

The proposed amendments add new delivery territories, including shuttle train loading facilities in a 12-county area of Northwest Ohio at a 20 cent per bushel discount, barge loading facilities on the Ohio River from Cincinnati to the Mississippi River at par, and barge loading facilities on the Mississippi River below St. Louis to Memphis at a 20 cent per bushel premium. The proposed amendments establish a seasonal storage premium charge of eight cents per bushel per month from July through November (the storage premium charge will remain five cents per bushel per month at all other times). Finally, the amendments reduce the vomitoxin level for par delivery from three parts per million (ppm) to two ppm. The amendments adding delivery territories and introducing a higher seasonal premium rate will become effective for the July 2009 contract, and the new vomitoxin specification will become effective for the September 2011 contract.

The proposed changes, according to the CBT, are intended to address concerns raised over the past two years by market participants about the wheat futures contract, especially the lack of cash/futures convergence at contract expiration.

Comments should be received on or before October 3, 2008.

Comments may be submitted electronically to secretary@cftc.gov. All comments will be posted on the CFTC's website.

Last Updated: September 9, 2008