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**U.S. COMMODITY FUTURES TRADING COMMISSION**

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April 18, 2001

Mr. Paul J. Draths  
Vice President and Secretary  
Chicago Board of Trade  
141 W. Jackson Boulevard  
Chicago, Illinois 60604-2994

Re: Chicago Board of Trade's Proposed Adoption of Regulation 331.05 – Block Trade Transactions and proposed amendments to CBOT Rules 310.00 and 332.00, and Regulations 332.01 and 350.05

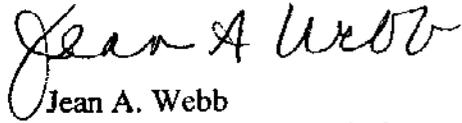
Dear Mr. Draths:

By letters dated August 31, 2000 through March 28, 2001, the Chicago Board of Trade ("CBOT" or "Exchange") has submitted to the Commission for prior approval pursuant to Section 5c(c)(2)(A) of the Commodity Exchange Act ("Act") proposed Regulation 331.05, and corresponding amendments to CBOT Rules 310.00 and 332.00, and Regulations 332.01 and 350.05. Proposed CBOT Regulation 331.05 and corresponding amendments to Exchange Rules 310.00 and 332.00, and Regulations 332.01 and 350.05 would establish block trading procedures at the Exchange whereby members and non-member customers that qualified as "eligible participants," as that term is defined by Commission Regulation 36.1(c)(2), would be allowed to negotiate and execute futures transactions of a minimum size bilaterally away from the centralized, competitive market. As proposed by CBOT, only contracts that are initially listed by the Exchange after December 31, 1999, would be eligible to participate in its block trading program.

Please be advised that on this date the Commission has determined to approve the Exchange's block trading proposal set forth in CBOT Regulation 331.05 and corresponding amendments to Exchange Rules 310.00 and 332.00, and Regulations 332.01 and 350.05 pursuant to Section 5c(c)(3) of the Act. The Exchange is reminded that it must provide to the Commission, pursuant to Section 5c(c) of the Act, either through written certification or a submission for prior approval, any proposal to designate futures or options contracts as eligible for block trading under CBOT Regulation 331.05. The Commission also reminds the Exchange that its block trading proposal only permits the noncompetitive execution of block trades and that compliance with CBOT's block trading procedures does not insulate block trades from other

requirements under the Act, the Commission's regulations promulgated thereunder or other applicable law.

Sincerely,

A handwritten signature in cursive script that reads "Jean A Webb". The signature is written in black ink and is positioned above the typed name.

Jean A. Webb  
Secretary of the Commission