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Chicago Mercantile Exchange

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January 11, 2005

Ms. Jean A. Webb  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**RE: Amendment to Cross-Margining Agreement  
Submission No. 05-04**

Dear Ms. Webb,

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commission that the Exchange has approved changes to CME's Cross-Margining Program with the Options Clearing Corporation ("OCC"). The amendment will allow put and call options on the Standard & Poor's Depository Receipts to be Eligible Contracts for OCC.

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

If you have any questions regarding this matter, please call me at (312) 648-5422.

Sincerely,

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

**AMENDMENT NO. 18 TO THE  
CROSS-MARGINING AGREEMENT**

This Amendment No. 18 to the Cross-Margining Agreement, dated May 19, 1997 (the "Agreement"), is entered into this 10<sup>th</sup> day of January, 2005, by The Options Clearing Corporation ("OCC"), and the Chicago Mercantile Exchange, Inc. ("CME"), whom are parties to the Agreement.

**Whereas**, the Agreement provides for the establishment of cross-margining arrangements applicable to proprietary transactions and transactions of market professionals whereby participating clearing members may elect to have certain futures contracts and options contracts cleared by the respective clearing organizations carried in special sets of accounts, each set to be combined and margined as a single account, all as more fully set forth in the Agreement;

**Whereas**, the Agreement permits the clearing organizations to agree in writing to add classes of Contracts to the list Eligible Contracts (as defined in the Agreement);

**Now, therefore**, in consideration of the mutual agreements contained herein, the parties agree, effective on the later of the execution hereof or receipt of necessary regulatory approvals, to amend Exhibit A to the Agreement to include as Eligible Contracts for OCC:

1. Put and call option contracts on the Standard & Poor's Depository Receipts.

The revised Exhibit A is attached hereto. The parties also agree that this Amendment No. 18 may be executed in counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

**Agreed to:**

The Options Clearing Corporation

Chicago Mercantile Exchange Inc.

By: \_\_\_\_\_

By: \_\_\_\_\_

Its: \_\_\_\_\_

Its: \_\_\_\_\_

Amendment No. 18  
OCC/CME/NYCC XM