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6/2/2005

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

Re: Rule Certification of Amendments to Rules 20102.E and 201A01.F. CME Submission #05-59.

Dear Ms. Webb,

Chicago Mercantile Exchange (CME), pursuant to Commission Regulation §40.6, informs the Commission of amendments to Random Length Futures Rule 20102.E-Position Limits and Options on Random Length Lumber Futures Rule 201A01.F-Position Limits.

The text of the rule amendments are as follows, with deletions overstruck and additions underlined:

RANDOM LENGTH LUMBER FUTURES

20102. FUTURES CALL

E. Position Limits

A person shall not own or control more than: ~~435 contracts in any one contract month.~~

1. 1,000 contracts long or short in any contract month;

2. 435 contracts long or short in the expiring contract month as of the close of business on the first business day of the contract month.

OPTIONS ON RANDOM LENGTH LUMBER FUTURES

201A01. OPTION CHARACTERISTICS

F. Position Limits

No person shall own or control a combination of options and underlying futures that exceeds ~~435~~ 1,000 futures equivalent contracts net on the same side of the market in any contract month.

For the purpose of this rule, the futures equivalent of an option contract is 1 times the previous business day's IOM risk factor for the option series. Also for the purposes of this rule, a long call option, a short put option, and a long underlying futures contract are on the same side of the market; similarly, a short call option, a long put option, and a short underlying futures contract are on the same side of the market.

It should be noted that the termination of trading for Options on Random Length Lumber Futures is on the last business day of the month prior to the delivery month of the underlying futures contract.

These changes will be applied to all contract months beginning on Friday, July 1, 2005.

There were no substantive opposing views.



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The Exchange certifies that this action complies with the Commodity Exchange Act and regulations thereunder.

Please do not hesitate to contact Jack Cook at 312-930-3295 or jcook@cme.com if any questions arise.

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Labuszewski", with a stylized flourish at the end.

John W. Labuszewski, Managing Director, Research & Product Development