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 **NEW YORK**
BOARD OF TRADE®
World Financial Center
One North End Avenue
New York, New York 10282

BY ELECTRONIC TRANSMISSION

05-25
June 9, 2005

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

Re: **Amendments to Rule 23.01(a)(12) and Pulp Appendix I -
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6**

Dear Ms. Webb:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commission Regulation 40.6, the Board of Trade of the City of New York, Inc. ("Exchange") submits, by written certification, amendments to Rule 23.01(a)(12) and Pulp Appendix I, attached as Exhibit A.

The amendment to Rule 23.01(a)(12) adds the requirement that a pulp Production Quality Certificate be issued on the letterhead of the Exchange approved mill or brand which creates the Certificate. The Certificate signifies that the pulp has been graded and meets the Exchange's standards for delivery. Since the signature of the person signing the Certificate for the mill or brand may not be familiar to the receiver who takes delivery of the pulp, or to Exchange staff who manage the delivery, the requirement that the Certificate be issued on the mill's letterhead gives added weight to its validity.

The amendment to Pulp Appendix I adds a mill to the list of Exchange approved mills or brands. The mill is Espanola, which is owned by the pulp firm Domtar, and is located in Ontario.

The Exchange certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The amendments were adopted by the Exchange's Board of Governors on June 8, 2005. The amendments will become effective on June 10, 2005. No substantive opposing views were expressed by members or others with respect to the amendments.

If you have any questions or need further information, please contact me at jfassler@nybot.com or 212-748-4084.

Sincerely,

Jill S. Fassler
Vice President
Associate General Counsel

cc: Riva Adriance
Thomas Leahy
CFTC, Division of Market Oversight
Allen Cooper
CFTC, New York Regional Office

(In the text of the amendments below, additions are underlined.)

Rule 23.01. Definitions; Calculation of Time

(a) In this Chapter and in all procedures and resolutions adopted by the Board hereunder, the following terms shall have the meanings indicated, unless the context otherwise requires:

* * *

(12) Production Quality Certificate

The term "Production Quality Certificate" shall mean a record created by the owner of an Exchange approved mill/brand that is issued on the Exchange approved mill's/brand's official letterhead in accordance with the testing methods required in Rule 23.04 and in a form prescribed by the Exchange, that signifies that the pulp has been graded. Such record shall state that the pulp either meets or does not meet Exchange standards.

[REMAINDER OF RULE UNCHANGED]

**APPENDIX I
EXCHANGE APPROVED MILLS/BRANDS**

<u>MILL/BRAND</u>	<u>COMPANY</u>	<u>NBSK</u>	<u>BSK</u>	<u>Radiata</u>
<i>North America</i>				
	* * *			
Lebel-sur-Quevillon	Domtar	*		
<u>Espanola</u>	<u>Domtar</u>	*		
Wallula	Boise	*		

[REMAINDER OF APPENDIX UNCHANGED]

EXHIBIT A