



Chicago Mercantile Exchange

20 South Wacker Drive
Chicago, IL 60606-7499
www.cme.com

312/930.1000 tel
312/466.4410 fax

September 12, 2005

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

RECEIVED
C.F.T.C.
2005 SEP 13 AM 11:01
OFFICE OF THE SECRETARIAT

RE: Section 5c(c)(1), Part 40.6 – Amendment to the E-Mini S&P 500
options on futures contract. CME Submission# 05-86.

Dear Ms. Webb:

Chicago Mercantile Exchange Inc. (“CME” or “Exchange”) hereby notifies the Commission of Amendments to the E-Mini S&P 500 (“ES”) options on futures contract. As approved by CME Staff through delegate authority, the Exchange will expand its strike listing range on the ES options contract.

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

Increased trading in the CME ES options contracts has created numerous requests for strikes that are not listed under the current strike listing rules. Customer demand has necessitated an expansion in the strike listing range in order to accommodate those requests. The Exchange will add exercise prices divisible by 25 within a range of 250 index points. This amendment will become effective during the week of the September 2005 expiration for all current and future contract listings. The amended rule language follows below.

If you require any additional information regarding this action, please do not hesitate to contact Ms. Ariel Hantin, Senior Research Analyst at 312-559-4951 or via e-mail at ahantin@cme.com. Please reference our CME Submission #05-86 on all future correspondence regarding this notification.

E-Mini S&P 500 Strike Listing Expansion
September 12, 2005
Page 2 of 4

Sincerely,

A handwritten signature in black ink, appearing to read "John W. Labuszewski". The signature is fluid and cursive, with a large initial "J" and "L".

John W. Labuszewski, Director
Research & Product Development

cc: Mr. Thomas M. Leahy and Mr. Steven B. Benton
CFTC Division of Market Oversight, Product Review & Analysis Section

Text of Rule Amendments

(Additions are underlined, deletions are bracketed and overstruck.)

358A01.E. Exercise Prices

The exercise prices shall be stated in terms of the E-Mini Standard and Poor's 500 Stock Price Index futures contract which is deliverable upon exercise of the option. The exercise prices shall be integers divisible by [~~10~~] 25 without remainder, e.g., 1000, 1025 [~~10~~], 1050 [~~20~~], etc.

At the commencement of trading for E-Mini S&P 500 option contracts the Exchange shall list all eligible exercise prices in a range of [~~1~~]250 basis points above and below the previous day's settlement price of the S&P 500 futures contract. Within a range of 150 index points above and below the previous day's settlement price of the S&P 500 futures contract, exercise prices that are integers divisible by 10 without remainder shall be added, if they have not already been listed. Within a range of 50 index points above and below the previous day's settlement price of the S&P 500 futures contract, exercise prices that are integers divisible by 5 without remainder shall be added, if they have not already been listed.

Thereafter, when a daily settlement price in the underlying futures contract occurs at, or passes through, any exercise price, the Exchange shall list on the next trading day put and call options with all eligible exercise prices in the above ranges.

The Board may modify the provisions governing the establishment of exercise prices as it deems appropriate.

Clean Copy of Rule Language

358A01.E. Exercise Prices

The exercise prices shall be stated in terms of the E-Mini Standard and Poor's 500 Stock Price Index futures contract which is deliverable upon exercise of the option. The exercise prices shall be integers divisible by 25 without remainder, e.g., 1000, 1025, 1050, etc.

At the commencement of trading for E-Mini S&P 500 option contracts the Exchange shall list all eligible exercise prices in a range of 250 basis points above and below the previous day's settlement price of the S&P 500 futures contract. Within a range of 150 index points above and below the previous day's settlement price of the S&P 500 futures contract, exercise prices that are integers divisible by 10 without remainder shall be added, if they have not already been listed. Within a range of 50 index points above and below the previous day's settlement price of the S&P 500 futures contract, exercise prices that are integers divisible by 5 without remainder shall be added, if they have not already been listed.

Thereafter, when a daily settlement price in the underlying futures contract occurs at, or passes through, any exercise price, the Exchange shall list on the next trading day put and call options with all eligible exercise prices in the above ranges.

The Board may modify the provisions governing the establishment of exercise prices as it deems appropriate.