CME Group

A CME/Chicago Board of Trade/NYMEX Company

February 5, 2009

Mr. David Stawick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

RE: CBOT Rule Amendments to Limit Holdings for Non-Commercial Purposes in Delivery Instruments Underlying Corn, Wheat, Oat, Rough Rice, Soybean, Soybean Oil and Soybean Meal Contracts CBOT Submission No. 09-001R

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commission that it is modifying its request for Commission approval concerning the implementation of rule amendments to limit the quantity of registered shipping certificates or warehouse receipts that a person may own or control for non-commercial purposes which was originally submitted on January 5, 2009. Subsequent to the original filing, CBOT decided to modify the date by which parties holding registered Soybean Oil receipts in excess of the new limits would have to come into full compliance with the new limits from May 31, 2009, to September 25, 2009. The decision was based on the larger number of outstanding receipts in Soybean Oil relative to the outstanding certificates/receipts in the other CBOT products affected by the proposed amendments. The modification has not necessitated any changes to the texts of the rule amendments and no other changes have been made relative to the original January 5 request for Commission approval.

With Commission approval, the new rules will be implemented on February 17, 2009, such that from that date forward no person may acquire certificates in excess of the limits. Entities holding certificates in excess of the new limits as of February 17, 2009, will have until May 31, 2009, to come into full compliance with the new limits with the exception of Soybean Oil where the date has been extended to September 25, 2009. As set forth in the original submission, a party holding a long position who stops certificates/receipts for delivery in a quantity that would cause the party to exceed the limit must cancel, retender or sell the quantity in excess of the limit by the end of the following business day.

CBOT certifies that this change complies with the Commodity Exchange Act and regulations thereunder.

If you have any questions regarding this matter, please contact Joe Hawrysz, Director, Market Surveillance, at 312.341.7750 or me at 312.648.5422. Please reference CBOT Submission No. 09-001R in any related correspondence.

Sincerely,

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

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