



November 26, 2008

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

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**RE: Amendment to CBOT Submission No. 08-138  
CBOT Submission No. 08-196**

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commission that it intends to amend submission 08-138, filed on September 5, 2008. CBOT Submission 08-138 is currently awaiting CFTC approval. This amendment is non-material.

Submission 08-138 includes a proposal to introduce seasonal premium (storage) charges to the Wheat futures contract. Specifically, the proposal calls for a higher storage charge during the period from July 1 through November 30 with standard storage rates from December 1 through June 30. However, storage charges at the CBOT are collected on the 17<sup>th</sup> of each month. For operational purposes, it is more efficient to implement storage rate changes on the 18<sup>th</sup> calendar day. Thus, the CBOT proposes to amend the original submission to incorporate the higher storage charge during the period from July 18 through December 17 with standard storage rates from December 18 through July 17.

The above amendment incorporates changes to rule 14108.

The text of the rule amendments are attached, with additions underlined and deletions overstruck.

The Exchange certifies that these changes comply with the Commodity Exchange Act and the regulations thereunder.

If you require any additional information regarding this action, please do not hesitate to contact David Lehman at 312-930-1875 or via e-mail at [David.Lehman@cmegroup.com](mailto:David.Lehman@cmegroup.com); Fred Seamon at 312-634-1587 or via e-mail at [Fred.Seamon@cmegroup.com](mailto:Fred.Seamon@cmegroup.com); or contact me at (312) 648-5422. Please reference our CBOT Submission #08-196 and/or #08-138 in any related correspondence.

**Mr. David Stawick**  
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Sincerely,

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

cc:

Walter Lukken  
Michael Dunn  
Jill E. Sommers  
Bart Chilton

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### **Text of Rule Amendments**

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

#### **Chapter 14 Wheat Futures**

##### **14108. PREMIUM CHARGES**

To be valid for delivery on futures contracts, all certificates covering wheat under obligation for shipment must indicate the applicable premium charge. No certificate shall be valid for delivery on futures contracts unless the premium charges on such wheat shall have been paid up to and including the 18th calendar day of the preceding month, and such payment is endorsed on the certificate. Unpaid accumulated premium charges at the posted rate applicable to the facility shall be allowed and credited to the buyer by the seller up to and including date of delivery.

**The premium charges on Wheat shall not exceed 26.5/100 of one cent per bushel per day during the period from July 18 through December 17.** The premium charges on Wheat shall not exceed 16.5/100 of one cent per bushel per day **during the period from December 18 through July 17.**