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July 10, 2007

Ms. Eileen Donovan
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: CME Rule 106.A. ("Authorization to Sell") and 106.B. ("Security Transactions"), Submission No. 07-51

Dear Ms. Donovan:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commission that the Exchange has approved amendments to CME Rules 106.A. and B. to remove references to Control Agreements as a way to secure a membership loan or a trading debit. Several existing Control Agreements on file with the Membership Department will continue to be honored until they are terminated. The rule changes are attached with the additions underlined and deletions lined out.

The Exchange certifies that these rule changes neither violate nor are inconsistent with any provision of the Commodity Exchange Act or of the rules and regulations thereunder.

If you have any questions regarding this matter, please call me at (312) 648-5422.

Sincerely,

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

106.A. ~~Control Agreements and Authorization to Sell~~

A ~~Control Agreement and an Authorization to Sell~~ ("Authorization Agreement") ~~are~~ is a grants of authority by a member or applicant for membership that may be used only for the purposes specified in this Rule 106. ~~Control and Authorization Agreements shall be effective only if executed on the form supplied by the Exchange and filed with the Department.~~ ~~Control and Authorization Agreements shall be irrevocable without the written consent of the grantee.~~

A member or applicant for membership who executes an Authorization Agreement ~~and/or Control Agreement~~ relinquishes his power to direct the sale of his membership ~~and/or Class A Shares,~~ as applicable. A grantee shall have all powers of sale that otherwise would have been available to the grantor. The Exchange shall act at the grantee's direction as if the grantee was the member-owner ~~and/or owner of Class A Shares,~~ as applicable.

Private agreements between the grantor and the grantee shall not be recognized by the Exchange and shall not affect the rights of the Exchange or its members. The grantee shall be entitled, in addition to any other rights he may have under Rule 110, to the residual proceeds after all Rule 110 claims have been satisfied up to the amount of the outstanding debt owed.

106.B. Security Transactions

A member, applicant for membership or a Non-Member Investor, may execute ~~a Control Agreement and/or~~ an Authorization Agreement, in favor of a clearing member, a financial institution or bank or in favor of the member that financed the purchase of the membership and associated Class B Share in order to secure any outstanding debt connected with that financing.

A member, applicant for membership or a Non-Member Investor, may execute ~~a Control Agreement and/or~~ an Authorization Agreement in favor of a member or clearing member to whom the member is indebted or may become indebted by reason of ~~futures~~ transactions upon the Exchange in order to secure such current or future debts.