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November 28, 2007

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

Re: Modification to Previously Approved CME Rule 536.F.

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. hereby notifies the Commission regarding changes to Rule 536.F. ("CTR Enforcement Program and Sanction Schedule).

The language in CME and CBOT Rules 536.F. ("CTR Enforcement Program and Sanction Schedule") that was previously approved in October reflected the harmonized "end state" rule language. However, because the CBOT's transition to the Price Reporting System does not occur until January and this system drives certain of the CTR processes, an interim rule necessary to accommodate the transition from current state to end state needs to be implemented on November 29, 2007. Until such time as these system and process changes are completed, CME and CBOT will need to maintain different language in their respective versions of Rule 536.F.

The interim language for CME Rule 536.F. will revert to the language that is currently set forth in CME Rule 536. The interim language for CBOT Rule 536.F. adopts existing CBOT exception processes and exception threshold levels for various member and clearing firm recordkeeping violations that presently exist as internal policies. However, under current CBOT rules, sanctions for these types of violations are issued by disciplinary committees that will no longer exist in the post November 29th disciplinary structure. Thus, the interim CBOT rule adopts staff administered fining schedules that are consistent with current CME fining schedules and with those of the previously approved end state rule.

If you require any additional information regarding this action, please do not hesitate to contact Mr. Robert Sniegowski at 312-648-5493 or via e-mail at robert.sniegowski@cmegroup.com. We would be appreciative if you could reference our CME Submission #07-96 in any related correspondence.

Sincerely,

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

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CME Rule 536.F. CTR Enforcement Program and Sanction Schedule

CTR Monthly Enforcement Program

The CTR threshold levels for members with 100 or more transactions per month are as follows:

Exception Type	Threshold Level
Bracket Exceptions	6% and above
Time of Execution (for verbal orders)	8% and above
Quote not found in Time and Sales	5 or more for futures 10 or more for options and back-month Eurodollar futures
Sequence Errors	8% and above

Violations of these thresholds shall be subject to automatic sanctions in accordance with the following schedule:

First offense	Warning letter
Second offense within 12 months	$500
Third offense within 12 months	$1,000
Any subsequent offense within 12 months	$5,000

Sanctions issued pursuant to the schedule are final and may not be appealed, however members will have 15 days after receipt of a notice of violation to present evidence to the Market Regulation Department that administrative, clerical, or other errors caused the apparent rule violation.

The monthly CTR enforcement of timestamp exceptions for firms with 1,000 or more transactions per month is 7% and above. Violations of this threshold shall be subject to automatic sanctions in accordance with the following schedule:

First offense	Warning letter
Second offense within 12 months	$1,500
Third offense within 12 months	$5,000
Any subsequent offense within 12 months	$10,000

Firms will have 15 days after receipt of a notice of violation to present evidence to the Market Regulation Department to have the violation dismissed. If the firm does not submit such evidence, or the Market Regulation Department determines that the evidence submitted is insufficient to reduce the percentage below the threshold level, the sanctions imposed pursuant to the schedule will be final and may not be appealed.

Notwithstanding these sanction schedules, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Probable Cause Committee for review.

CTR Clearing Member Back Office Audit Enforcement Program

The Market Regulation Department will conduct audits of CME clearing members in order to verify the accurate recoding and submitting of required audit trail information. The CTR audit threshold levels for the various firm deficiencies are as follows:

Deficiency Type	Threshold Level
Failure to pick up documents in accordance with CME schedule for:	
Sequence Cards	20%
Verbal Order Cards	20%
Floor Cards	10%
Failure to accurately submit and record Order Type Indicator	10%
Failure to accurately submit Flashed Order Indicator	10%

Percentage calculations will be made on the basis of an examination of a minimum of 50 sequenced cards, 50 verbal orders, or 50 floor orders, depending on the deficiency type. The total number of exceptions in each category will be divided by the total number of documents examined in that category in determining the deficiency percentage.

Violations of these thresholds shall be subject to automatic fines in accordance with the following schedule:

First offense	$1,000
Second offense within 24 months	$2,500
Third offense within 24 months	$5,000
Any subsequent offense within 24 months	$10,000

Firms will have 15 days after receipt of a notice of violation to present evidence to the Market Regulation Department to have the violation dismissed. If the firm does not submit such evidence, or the Market Regulation Department determines that the evidence submitted is insufficient to reduce the percentage below the threshold level, the sanctions imposed pursuant to the schedule will be final and may not be appealed.

Notwithstanding this sanction schedule, the Market Regulation Department may, at any time, refer matters that it deems egregious to the Probable Cause Committee for review.