



Via Electronic Mail

January 12, 2010

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OFFICE OF THE SECRETARIAT  
C.F.T.C.

Mr. David Stawick  
Secretary of the Commission  
Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street NW  
Washington, D.C. 20581

SUBJECT: Rule Certification

Dear Mr. Stawick:

Pursuant to Commodity Exchange Act ("CEAct") Section 5c(c)(1) and Commodity Futures Trading Commission ("Commission") Regulation 40.6(a), the Minneapolis Grain Exchange ("MGEX") hereby certifies that the attached amended Regulations comply with the CEAct and the regulations thereunder. Additions have been underlined while deletions have been marked through.

The purpose for amending MGEX Regulations 2013.00. and 2013.01. is to increase the speculative position limits for the National Corn Index, National Soybean Index, Hard Red Winter Wheat Index and Hard Red Spring Wheat Index contracts. Increased limits are necessary to provide market participants the opportunity to arbitrage the Index positions against other markets with higher speculative limits. The increased limits would apply to contract months without open interest.

Pursuant to the authority of MGEX Rule 210.01., the Board of Directors unanimously approved amending the Regulations. The changes are to be effective January 13, 2010. If there are any questions regarding this submission, please contact me at (612) 321-7169. Thank you for your attention to this matter.

Sincerely,

Layne G. Carlson  
Corporate Secretary

Enclosure  
cc: Thomas J. Bloom  
Anne Reuter

**2013.00. FUTURES POSITION LIMITS.**

- A. **National Corn Index.** Pursuant to the provisions of **Rule 7308.00.**, the Board of Directors has adopted this Regulation.

No individual or entity shall own or control in excess of ~~one thousand (1,000)~~thirteen thousand five hundred (13,500) contracts net long or short in the settlement month, ~~one thousand (1,000)~~thirteen thousand five hundred (13,500) contracts net long or short in any single month, and ~~two thousand five hundred (2,500)~~or twenty-two thousand (22,000) contracts net long or short in all contract months combined.

- B. **National Soybean Index and Wheat Indices.** Pursuant to the provisions of **Rules 7508.00., 7708.00., 7908.00. and 8108.00.**, the Board of Directors has adopted this Regulation.

No individual or entity shall own or control in excess of six thousand five hundred (6,500) contracts net long or short in the settlement month (except during the last five trading days when the limit shall be five thousand six hundred (5,600) contracts net long or short), six thousand five hundred (6,500) contracts net long or short in any single month, or one thousand (1,000) ten thousand (10,000) contracts net long or short in all contract months combined, or one thousand (1,000) contracts net long or short in any single contract month.

- C. **Hard Red Winter Wheat Index.** Pursuant to the provisions of **Rule 7708.00.**, the Board of Directors has adopted this Regulation.

No individual or entity shall own or control in excess of five thousand (5,000) contracts net long or short in the settlement month, five thousand (5,000) contracts net long or short in any single month, or six thousand five hundred (6,500) contracts net long or short in all contract months combined.

- D. **Hard Red Spring Wheat Index.** Pursuant to the provisions of **Rule 8108.00.**, the Board of Directors has adopted this Regulation.

No individual or entity shall own or control in excess of five thousand (5,000) contracts net long or short in the settlement month (except during the last five trading days the limit shall be three thousand four hundred (3,400) contracts net long or short), five thousand (5,000) contracts net long or short in any single month, or six thousand five hundred (6,500) contracts net long or short in all contract months combined.

**2013.01. OPTIONS POSITION LIMITS.**

- A. **National Corn Index.** Pursuant to the provisions of **Rule 7412.00.**, the Board of Directors has adopted this Regulation.

No individual or entity shall own or control a combination of Options and underlying Futures Contracts that exceeds ~~two thousand five hundred (2,500)~~twenty-two thousand (22,000) futures-equivalent contracts net long or short in all contract months combined, ~~one thousand (1,000)~~thirteen thousand five hundred (13,500) futures-equivalent contracts net long or short in any single contract month, or ~~one thousand (1,000)~~thirteen thousand five hundred (13,500) futures-equivalent contracts net long or short in the settlement month.

- B. ~~National Soybean Index and Wheat Indices~~. Pursuant to the provisions of ~~Rules 7612.00., 7812.00., 8012.00., and 8212.00.~~, the Board of Directors has adopted this Regulation.

~~No individual or entity shall own or control a combination of Options and underlying Futures Contracts that exceeds one thousand (1,000) ten-thousand (10,000) futures-equivalent contracts net long or short in all contract months combined, or one thousand (1,000) six-thousand five-hundred (6,500) futures-equivalent contracts net long or short in any single contract month, or six-thousand five-hundred (6,500) futures-equivalent contracts net long or short in the settlement month (except during the last five trading days when the limit shall be five-thousand six-hundred (5,600) futures-equivalent contracts net long or short).~~

- C. Hard Red Winter Wheat Index. Pursuant to the provisions of Rule 7812.00., the Board of Directors has adopted this Regulation.

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No individual or entity shall own or control a combination of Options and underlying Futures Contracts that exceeds six-thousand five-hundred (6,500) futures-equivalent contracts net long or short in all contract months combined, five-thousand (5,000) futures-equivalent contracts net long or short in any single contract month, or five-thousand (5,000) futures-equivalent contracts net long or short in the settlement month.

- D. Hard Red Spring Wheat Index. Pursuant to the provisions of Rule 8212.00., the Board of Directors has adopted this Regulation.

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No individual or entity shall own or control a combination of Options and underlying Futures Contracts that exceeds six-thousand five-hundred (6,500) futures-equivalent contracts net long or short in all contract months combined, five-thousand (5,000) futures-equivalent contracts net long or short in any single contract month, or five-thousand (5,000) futures-equivalent contracts net long or short in the settlement month (except during the last five trading days when the limit shall be three-thousand four-hundred (3,400) futures-equivalent contracts net long or short).

For the purpose of this Regulation, a long call option, a short put option and a long underlying Futures Contract are on the long side of the market; similarly, a short call option, a long put option and a short underlying Futures Contract are on the short side of the market.