CME Group

A CME/Chicago Board of Trade/NYMEX Company

January 14, 2010

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

RE: **Position Limit, Position Accountability & Reportable Level Table
NYMEX/COMEX Submission No. 10-014**

Dear Mr. Stawick:

The New York Mercantile Exchange, Inc. ("NYMEX") and The Commodity Exchange, Inc. ("COMEX") (collectively, "the Exchanges") hereby notify the Commodity Futures Trading Commission that they have adopted clarifying amendments to the Header Notes to the Position Limit, Position Accountability and Reportable Level Table ("Table") in the Interpretations & Special Notices Section of Chapter 5 of the NYMEX Rulebook. The amendments clarify that position limits and position accountability levels are calculated inclusive of commodities that aggregate into one or more base contracts as set forth in the Table. Additionally, a paragraph has been added to provide additional information on the manner in which the aggregations take place in that there is a positive correlation with respect to the contracts listed in the first aggregation box in the Table, titled "Aggregate Into (1)" and a negative correlation with respect to the contracts listed in the second aggregation box in the Table, titled "Aggregate Into (2)."

The amendments are set forth below, with additions underscored and deletions overstruck.

POSITION LIMIT, POSITION ACCOUNTABILITY AND REPORTABLE LEVEL TABLE
Header Notes

1.   Position Limits and Any One Month/All Month/Expiration Month Position Accountability Levels shall be calculated on a net futures-equivalent basis by commodity, and will include commodities that aggregate into one or more base contracts as set forth in the Table.

Furthermore, tThe Exchange may require compliance with position accountability levels on a futures-only basis to the base contracts into which other contracts aggregate.

For commodities that aggregate into only one base contract, the base contract will be identified in the first "Aggregate Into" column (Aggregate Into column (1) and will denote a positive correlation with the base commodity contract. For commodities that aggregate into two separate base contracts, the base contract noted in the first "Aggregate Into" column (Aggregate Into column (1) will denote a positive correlation and the base contract noted in the second Aggregate Into column (Aggregate Into column (2) will denote a negative correlations with respect to the base commodity contract.

[The remainder of the Header Notes are unchanged.]

The Exchanges certify that the amendments comply with the Commodity Exchange Act and regulations thereunder.

If you have any questions regarding the Advisory Notices, please contact Robert Sniegowski, Market Regulation, at 312.341.5991 or me at 312.648.5422. Please reference NYMEX/COMEX Submission No. 10-014 in any related correspondence.

Sincerely,

/s/ Stephen M. Szarmack
Regulatory Counsel

8036