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January 28, 2008

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

RE: Amendments to CME Rule 600 and CBOT Rule 600
Submission No. 08-19

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME") and the Chicago Board of Trade ("CBOT") (collectively, "the Exchanges") hereby certify the attached amendments to CME Rule 600 ("Permissive Arbitrations") and CBOT Rule 600 ("Permissive Arbitrations") per Sec. 5(c)(1) of the Commodity Exchange Act and Regulation Sec. 40.6(a) thereunder.

These changes coincide with the recent changes to CME and CBOT Rule 588, and are also necessary to make Rule 600 consistent with a time period specified in Rule 622.

The Exchanges certify that these amendments neither violate nor are inconsistent with any portion of the Commodity Exchange Act or of the rules thereunder.

If you require any additional information regarding this action, please do not hesitate to contact Mr. Robert Sniagowski at 312-648-5493 or via e-mail at robert.sniagowski@cmegroup.com or me. We would be appreciative if you could reference our CBOT Submission #08-05 in any related correspondence.

Sincerely,

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

CME 600. DISPUTES SUBJECT TO CME ARBITRATION

[Section A. – C. are unchanged.]

600.D. Permissive Arbitrations

The following may be submitted for arbitration at the Exchange and, in the event such a claim is submitted against a member, that member is required to arbitrate the dispute under these rules, unless otherwise provided:

[1. is unchanged.]

2. claims against an Exchange clearing member and its Globex user pursuant to Rule 588.C.3.a., ~~and b., or c.~~, where the claimant has complied with the provisions of Rule 588.D., and pursuant to Rule 588.C.3.d., provided that any non-member Globex user has consented to arbitration of the dispute at the Exchange within 210 days of receipt of a claim;

[The remainder of the rule is unchanged.]

CBOT 600. DISPUTES SUBJECT TO CBOT ARBITRATION

[Sections A. – C. are unchanged.]

600.D. Permissive Arbitrations

The following may be submitted for arbitration at the Exchange and, in the event such a claim is submitted against a member, that member is required to arbitrate the dispute under these rules, unless otherwise provided:

[1. is unchanged.]

2. claims against an Exchange clearing member and its Globex user pursuant to Rule 588.C.3.a., ~~and b., or c.~~, where the claimant has complied with the provisions of Rule 588.D., and pursuant to Rule 588.C.3.d., provided that any non-member Globex user has consented to arbitration of the dispute at the Exchange within 210 days of receipt of a claim;

[The remainder of the rule is unchanged.]