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February 14, 2008

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

**RE: CBOT Rules 31B07 and 32B07
 CBOT Submission No. 08-35**

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") hereby notifies the Commission that the Exchange has amended CBOT Rule 31B07 ("Deliveries") for Mini-Sized Gold Futures and CBOT Rule 32B07 ("Deliveries") for Mini-Sized Silver Futures to include the delivery of contracts by warehouse depository receipts.

Copies of the amended rules are attached with additions underlined and deletions struck out.

CBOT certifies that these 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 contact Joe Hawrysz, Associate Director, Market Surveillance at (312) 341-7750 or me at (312) 648-5422.

Sincerely,

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

**CBOT Chapter 31B
Mini-Sized Gold Futures**

31B07. DELIVERIES BY VAULT RECEIPTS

31B07.A. Deliveries by Vault Receipts

[The text of this section is unchanged.]

31B07.B. Deliveries by Gold Warehouse Depository Receipts

Deliveries of CBOT mini-sized Gold may be made by delivery of Warehouse Depository Receipts (WDRs), created by the Exchange from registered vault receipts issued by vaults which have been declared regular for delivery of Gold by the Exchange, utilizing the electronic delivery system via the Clearing House's on-line system. In order to effect a valid delivery, each WDR must be endorsed by the clearing member making the delivery, and transfer as specified herein constitutes endorsement. Such endorsement shall constitute a warranty of the genuineness of the WDR and of good title thereto, but shall not constitute a guaranty, by an endorser, of performance by the vault. Such endorsement shall also constitute a representation that all storage charges have been paid on the Gold covered by the WDR, in accordance with Rule 31B08.

WDRs may not be cancelled for load-out. Upon the return of three (3) WDRs to the Exchange, and payment of all storage charges pertaining to the Gold represented, for which the Exchange claims a lien, a registered vault receipt will be delivered by the Exchange to the holder of the three (3) WDRs, utilizing the electronic delivery system via the Clearing House's on-line system. Delivery of a vault receipt to the holder of the WDRs shall not constitute a guaranty by the Exchange of performance by the vault.

**CBOT Chapter 32B
Mini-Sized Silver Futures**

32B07. DELIVERIES BY VAULT RECEIPTS

32B07.A. Deliveries by Vault Receipts

[The text of this section is unchanged.]

32B07.B. Deliveries by Silver Warehouse Depository Receipts

Deliveries of CBOT mini-sized Silver may be made by delivery of Warehouse Depository Receipts (WDRs), created by the Exchange from registered vault receipts issued by vaults which have been declared regular for delivery of silver by the Exchange, utilizing the electronic delivery system via the Clearing House's on-line system. In order to effect a valid delivery, each WDR must be endorsed by the clearing member making the delivery, and transfer as specified herein constitutes endorsement. Such endorsement shall constitute a warranty of the genuineness of the WDR and of good title thereto, but shall not constitute a guaranty, by an endorser, of performance by the vault. Such endorsement shall also constitute a representation that all storage charges have been paid on the silver by the WDR, in accordance with Rule 32B08.

WDRs may not be cancelled for load-out. Upon return of a WDR to the Exchange, and payment of all storage charges pertaining to the silver represented, for which the Exchange claims a lien, a registered vault receipt will be delivered by the Exchange to the holder of the WDR, utilizing the electronic delivery system via the Clearing House's on-line system. Delivery of a vault receipt to the holder of the WDR shall not constitute a guaranty by the Exchange of performance by the vault.