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March 19, 2009

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

**RE: CME Chapter 5 - Position Limit and Reportable Level Table
CME Submission No. 09-046**

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME") hereby notifies the Commission of amendments to the CME Position Limit and Reportable Level Table in the Interpretations & Special Notices Relating to Chapter 5 section of the CME Rulebook to eliminate a duplicate entry of S&P GSCI ER Index futures and to make minor changes to the contract names for the S&P GSCI ER Index futures and S&P GSCI ER Index swaps. The changes are effective immediately.

The pertinent section of the Table is attached, with additions underscored and deletions overstruck.

CME certifies that these changes comply with the Commodity Exchange Act and regulations thereunder.

If you have any questions regarding this matter, please contact Robert Sniegowski, Associate Director, Market Regulation Department, at 312.341.5991 or me at 312.648.5422. Please reference CME Submission No. 09-046 in any related correspondence.

Sincerely,

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

POSITION LIMIT AND REPORTABLE LEVEL TABLE

CONTRACT NAME	OPTIONS	SCALE-UP IN SPOT MONTH (1)	SCALE-DOWN SPOT MONTH (2)	SPOT MONTH	SINGLE MONTH	ALL MONTHS COMBINED	POSITION ACCOUNTABILITY	REPORTABLE LEVEL	REPORTABLE OPT LEVEL
CME Commodities									
Butter	Y	50		150	*900	*1,000		25	25
Cash-Settled Butter	Y			100	*500			25	25
Class III Milk	Y				*1,500			25	25
Class IV Milk	Y			250	*1,000			25	25
Dry Whey	Y			200	*1,000			25	25
Feeder Cattle	Y			300	*1,600			25	25
Frozen Pork Bellies	Y	*(A) 75 or 50 or 25	*(B) 25 or 10	100	*800	*1,000		5	5
S&P Goldman Sachs Commodity Index	Y					*10,000		25	25
Goldman Sachs ER Index						*10,000		25	
S&P GSCI ER Index futures						*10,000		25	
S&P GSCI ER Index swaps							**10,000	1	
Lean Hogs	Y			950	*4,100			25	25
Live Cattle	Y	300		450	*5,400			25	25
Random Length Lumber	Y			435	*1,000			25	25
Nonfat Dry Milk	Y			100	*1,000			25	25
Northern Bleached Softwood KP	Y				*1,000			25	25
Bleached Hardwood Kraft Pulp	Y				*1,000			25	25
<p>*(A) The scale-Down levels in the spot month depends on "Deliverable Supply" shall mean the number of registered deliverable pork bellies reported to the CME Clearing House Department's weekly report immediately <i>preceding</i> the first Friday of each expiring contract.</p> <p>*(B) The scale-Down levels in the spot month depends on "Deliverable Supply" shall mean the number of registered deliverable pork bellies reported to the CME Clearing House Department's weekly report immediately <i>following</i> the first Friday of each expiring contract.</p> <p>*Net futures equivalents (NFE) long or short.</p> <p>** Position Accountability rule: A person owning or controlling more than the specified number of futures or futures equivalent contracts net long or short in any single contract in all contract months combined shall provide, in a timely fashion, upon request by the Exchange, information regarding the nature of the position, trading strategy, and hedging information if applicable.</p>									