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May 16, 2011

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

**RE: Section 5c(c)(1), Part 40.6 - Rule Certification
For Options on Nikkei Stock Average Futures Minimum Fluctuations
Language Revised
CME Submission No. 11-177**

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission of revisions to the language regarding Options on Nikkei Stock Average Futures minimum fluctuations.

The change does not substantively impact the Options on Nikkei Stock Average Futures. The purpose of the change is to harmonize the language description for the options on equity index futures.

CME certifies that this action complies with the Commodity Exchange Act and regulations thereunder. There were no substantive opposing views to this proposal.

If you require any additional information regarding this action, please do not hesitate to contact Mr. John Nyhoff, Director-Research & Product Development, at 312-930-2310 or via e-mail at john.nyhoff@cmegroup.com, Lucy Wang at 312-648-5478 or via e-mail at lucy.wang@cmegroup.com. Alternatively, you may contact me at 312-930-8167. Please reference CME Submission No. 11-177 in any related correspondence.

Sincerely,

/s/ Sean Downey
Associate Director and Assistant General Counsel

cc: Mr. Thomas M. Leahy and Mr. Philip Colling
CFTC Division of Market Oversight, Product Review & Analysis Section

Text of Rule Amendments

(Additions are underlined, deletions are bracketed and overstruck)

Chapter 352A Options on Nikkei Stock Average Futures

352A00. SCOPE OF CHAPTER

This chapter is limited in application to trading in put and call options on the Nikkei Stock Average futures contract ("Nikkei options"). The procedures for trading, clearing, inspection, delivery and settlement and any other matters not specifically covered herein shall be governed by the rules of the Exchange.

352A01. OPTION CHARACTERISTICS

352A01.A. Contract Months , Trading Hours, and Trading Halts ¹

Options contracts shall be listed for such contract months and scheduled for trading during such hours, except as indicated below, as may be determined by the Board of Directors.

352A01.B. Trading Unit

The trading unit shall be an option to buy, in the case of the call, or to sell, in the case of the put, one Nikkei Stock Average futures contract as specified in Chapter 352.

352A01.C. Minimum Fluctuations

The price of an option shall be quoted in index points. Each index point shall represent \$5. The minimum fluctuation shall be ~~[5 index points (also known as one tick), equivalent to \$25 per contract. Trades may also occur at a price of]~~ 2.5 index points (\$12.50, also known as one-half tick), ~~[whether or not such trades result in the liquidation of positions for both parties to the trade.]~~

Clean Copy Chapter 352A Options on Nikkei Stock Average Futures

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¹¹ Revised January 1991, December 2001.

²² Revised January 1991, December 2001.