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June 17, 2011

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

**RE: Delisting of CBOT Mini-Sized Three-Month Eurodollar Time Deposit Futures
CBOT Submission No. 11-216**

Dear Mr. Stawick:

The Chicago Board of Trade, Inc. ("CBOT" or "Exchange") hereby notifies the Commodity Futures Trading Commission that the Exchange delisted the Mini-Sized Three-Month Eurodollar Time Deposit futures contract following the final settlement of the June 2011 expiry on **Monday, June 13, 2011**.

CBOT Mini Eurodollar futures have not posted trading volume or open interest since January 2005, effectively falling dormant as a result of no market demand.

The delisting of CBOT Mini Eurodollar futures necessitates the deletion of CBOT Rulebook Chapter 36, revisions to the Position Limit, Position Accountability, and Reportable Level table in Chapter 5 of the CBOT Rulebook, and revisions to the Globex Non-Reviewable Trading Ranges in CME, CBOT, and NYMEX Rule 588.G.

The CBOT certifies that the delisting and ancillary revisions comply with the Commodity Exchange Act and regulations thereunder. There were no substantive opposing views to this proposal.

Please direct inquiries regarding this submission to Daniel Grombacher at 312.634.1583 or via e-mail at daniel.grombacher@cmegroup.com. Alternatively, you may contact me at 312.930.8167. Please reference CBOT Submission No. 11-216 in any related correspondence.

Sincerely,

/s/ Sean Downey
Associate Director and Assistant General Counsel

Attachments

Attachment 1

(Deletions are struckthrough.)

~~Chapter 36~~

~~CBOT Mini Sized Three Month Eurodollar Time Deposit Futures~~

~~36100. SCOPE OF CHAPTER~~

~~This chapter is limited in application to futures trading of CBOT mini-sized Eurodollar futures. The procedures for trading, clearing, delivery and settlement of mini-sized Eurodollar futures, and any other matters not specifically covered herein or in Chapter 7 shall be governed by the general rules of the Exchange.~~

~~36101. STANDARDS~~

~~Each contract which is not offset prior to the expiration of trading shall be offset with the Clearing House on the second London bank business day immediately preceding the third Wednesday of the contract month at a settlement price established by the International Monetary Market for settlement of its corresponding expiring Three Month Eurodollar Time Deposits futures contract. If the foregoing date for cash settlement is an Exchange holiday, each contract which is not offset prior to the expiration of trading shall be offset with the Clearing House on the next succeeding Exchange business day.~~

~~36102. TRADING SPECIFICATIONS~~

~~Trading in mini-sized Eurodollar futures may be scheduled in such months as determined by the Exchange.~~

~~36102.A. Trading Schedule~~

~~The hours of trading for future delivery in mini-sized Eurodollar futures shall be determined by the Exchange.~~

~~On the last day of trading in an expiring future, the closing time for such future shall be 11:00 a.m. London time. (5:00 a.m. Chicago time except when Daylight Savings Time is in effect in either, but not both, London or Chicago).~~

~~36102.B. Trading Unit~~

~~The unit of trading shall be three-month Eurodollar time deposits in the amount of \$500,000.~~

~~36102.C. Price Increments~~

~~Minimum price fluctuations shall be one half of one basis point (0.005) of \$500,000 on a 90-day basis, or \$6.25 per contract. Prices shall be quoted in terms of an index consisting of the difference between the number 100.00 and the three-month Eurodollar yield on an annual basis for a 360-day year. (For example, a deposit rate of 4.50 percent shall be quoted as 95.50.) Contracts shall not be made on any other price basis.~~

Attachment 1 (continued)

~~36102.D.~~ **Settlement Price**

~~Settlement prices shall be set in accordance with this rule consistent with the settlement prices of the corresponding contracts of the primary market for such contract. Where a particular contract has opened on the Exchange for which the primary market has established no settlement price, the Clearing House shall set a settlement price consistent with the spread relationships of other contracts.~~

~~36102.E.~~ **Position Limits**

~~In accordance with Rule 559, Position Limits and Exemptions, no person shall own or control positions in excess of:~~

- ~~1. 10,000 contracts net long or net short in the spot month.~~
- ~~2. 10,000 contracts net long or net short in any single contract month.~~
- ~~3. 10,000 contracts net long or net short in all months combined.~~

~~Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.~~

~~36102.F.~~ **Termination of Trading**

~~The last day of trading in mini-sized Eurodollar futures contracts, deliverable in the current month, shall be the second London bank business day immediately preceding the third Wednesday of the contract month.~~

~~36103.~~ **DELIVERY ON FUTURES CONTRACTS**

~~Deliveries against mini-sized Eurodollar futures contracts must be made through the Clearing House. Delivery under these rules shall be made on settlement day and shall be accomplished by cash settlement as hereinafter provided.~~

~~The Clearing House will advise clearing members holding open positions in mini-sized Eurodollar futures contracts deliverable in the current month of the final settlement price established for that month, as soon as practicable on settlement day. Clearing members shall then make payment to and receive payment through the Clearing House in accordance with normal variation settlement procedures, based on the settlement price.~~

Attachment 2

(Deletions are ~~struckthrough~~.)

Proposed Changes to Table 5.C. on CBOT Position Limit and Reportable Levels

CONTRACT NAME	Opts	SCALE-DOWN SPOT MONTH	SPOT ^[a] MONTH	SINGLE ^[b] MONTH	ALL ^[c] MONTHS COMBINED	POSITION ACCOUNTABILITY Futures/Options ^[d]	REPORTABLE FUTURES LEVEL	REPORTABLE OPTIONS LEVEL
FINANCIALS								
Long-Term U.S. Treasury Bonds	Y	(see #13)				10,000/25,000	1,500	1,500
U.S. Treasury Bonds	Y	(see #13)				10,000/25,000	1,500	1,500
U.S. Treasury Notes (2 yr.)	Y	(see #13)				7,500 / 20,000	1,000	1,000
U.S. Treasury Notes (3 yr.)		(see #13)				7,500 / N/A	750	
U.S. Treasury Notes (5 yr.)	Y	(see #13)				7,500 / 20,000	2,000	2,000
U.S. Treasury Notes (6 ½ - 10 yr.)	Y	(see #13)				7,500 / 20,000	2,000	2,000
On-the-Run Treasury Yield (2 yr.)						7,500 / N/A	25	
On-the-Run Treasury Yield (5 yr.)						7,500 / N/A	25	
On-the-Run Treasury Yield (10 yr.)						7,500 / N/A	25	
30 Day Fed Fund	Y					3,000 (e) / 3,000 (e)	600	600
30 Day Fed Fund Mid-Curve Options	Y					3,000 (e)		25
30-Year Interest Rate Swap	Y					5,000 / 15,000	500	25
10-Year Interest Rate Swap	Y					5,000 / 15,000	500	500
7-Year Interest Rate Swap	Y					5,000 / 15,000	25	25
5-Year Interest Rate Swap	Y					5,000 / 15,000	500	500
Mini-sized Eurodollars			40,000	40,000	40,000		400	

[a] Net long or short effective at the close of trading two business days prior to the first trading day of the delivery month.

[b] Futures-equivalent position limit net long or net short in any one month other than the spot month. Net equivalent futures long or short in all months and strike prices combined.

[c] Futures-equivalent position limit net long or net short in all months and strike prices combined. Long futures contracts, long call options, and short put options are considered to be on the long side of the market, while short futures contracts, long put options, and short call options are considered to be on the short side of the market.

[d] As described in Rule 560. Futures levels refer to futures equivalent contracts. Options levels refer to option contracts for all months and all strike prices combined in each option category (long call, long put, short call and short put).

[e] Net Futures Equivalent Positions are combined across 30 Day Fed Fund futures, standard options on 30 Day Fed Fund futures, and mid-curve options on 30 Day Fed Fund futures to determine Position Accountability.

Attachment 3

(Deletions are ~~struck through~~.)

**Proposed Changes to
CME Rulebook, Chapter 5, Rule 588.G. Non-Reviewable Trading Ranges
CBOT Rulebook, Chapter 5, Rule 588.G. Non-Reviewable Trading Ranges
NYMEX Rulebook, Chapter 5, Rule 588.G. Non-Reviewable Trading Ranges**

588.G. Non-Reviewable Trading Ranges

<u>Futures Contract</u>	<u>Non-Reviewable Range</u>
Eurodollar, E-mini Eurodollar and LIBOR	2.5 basis points
Long Term U.S. Treasury Bond	30/32nds
U.S. T-Bond	30/32nds
10 Yr. T-Note (including OTR)	30/32nds
5 Yr. T-Note (including OTR)	15/32nds
3 Yr. T-Note	15/32nds
2 Yr. T-Note (including OTR)	15/32nds
30-Day Fed Funds	5 basis points
3-Month Overnight Index Swaps	5 basis points
Interest Rate Swaps (30 Yr., 10 Yr., 7 Yr., and 5 Yr.)	30/32nds
Euroyen	2.5 basis points
T-Bills	5 basis points
CME Barclays Capital U.S. Aggregate Index	2.00 index points
10-Year Sovereign Yield Spread	5 basis points