

C.F.T.C.
OFFICE OF THE SECRETARIAT
2009 AUG 14 AM 7 54



August 11, 2009

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

**RE: Delayed Effective Date for the Adoption of the Rule Changes
Concerning the Harmonization of NYMEX & COMEX Trade Practice
Rules with CME Rules
CME/CBOT/NYMEX Submission No. 09-160**

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME"), The Board of Trade of the City of Chicago, Inc. ("CBOT") and The New York Mercantile Exchange, Inc. ("NYMEX") (collectively, the "Exchanges") hereby notify the Commodity Futures Trading Commission ("Commission") that they are delaying the adoption of the rule changes in connection with the harmonization of the NYMEX and COMEX trade practice rules with CME rules. This delay affects the August 17 effective date set forth in the following submissions concerning the text of the revised rules and the issuance of several Market Regulation Advisory Notices:

- CME/CBOT Submission No. 09-137 from July 28, 2009
- NYMEX Submission No. 09.141 from July 28, 2009
- CME Submission No. 09-141 from July 29, 2009
- NYMEX Submission No. 09.145 from July 29, 2009
- CME/CBOT/NYMEX Submission No. 09.146 from July 29, 2009
- NYMEX Submission No. 09.149 from July 31, 2009
- CME/CBOT/NYMEX Submission No. 09.151 from August 3, 2009
- CME/CBOT/NYMEX Submission No. 09.150 from August 6, 2009

The delay is based on a delay in the integration date for migrating COMEX products to the CME Clearing platform. The revised effective date for the implementation of the rule changes will be provided to the Commission as soon as it is determined, at which time the Market Regulation Advisory Notices will be re-issued with corrected effective dates.

If you have any questions, please contact Robert Sniegowski, Associate Director, Market Regulation, at 312.341.5991 or me at 312.648.5422. Please reference CME/CBOT/NYMEX Submission No. 09-160 in any related correspondence.

Sincerely,

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