



August 22, 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. 11-323**

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission of an amendment to CME Rule 351A01.C. ("Minimum Fluctuations") concerning S&P 500 Index Options Box Spread Tick.

In an effort to respond to market needs, CME recommends the extension of the index option variable tick policy to encompass the Box spread in S&P 500 index options. On Tuesday, September 6, 2011, all the box spreads for S&P 500 will be able to trade in half tick, or 0.05 increments.

Box spreads are essentially interest rate products, allowing customers to either borrow, or lend, funds via the box spread. This is a delta neutral spread involving long and short positions in two option strikes, such as the 500 and the 2500 strikes. In the current interest rate environment, CME box spreads are at a competitive disadvantage to the Chicago Board Options Exchange, Inc. S&P 500 spreads which trade in penny increments. In order to be more competitive, we need to provide additional pricing granularity to support effective pricing of the spreads.

The Exchange 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 Ms. Lucy Wang at 312-648-5478 or via e-mail at lucy.wang@cmegroup.com. Alternatively, you may contact me at 312-930-8167 or via e-mail at Sean.Downey@cmegroup.com. Please reference CME Submission No. 11-323 on all future correspondence regarding this notification.

Sincerely,

/s/ Sean Downey
Associate Counsel 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 351A

Options on Standard and Poor's 500 Stock Price Index™ Futures

351A01. OPTION CHARACTERISTICS

[351A01.A. and B. remain unchanged.]

351A01.C. Minimum Fluctuations

The price of an option shall be quoted in index points. Each .01 index point shall represent \$2.5. The minimum fluctuation shall be .10 index points (\$25.00, also known as one tick). Trades may also occur at a price of .05 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. A trade with a price equal to or less than 5.00 index points may also occur at a price in multiples of .05 index points, e.g., .15 index points (\$37.50, also known as one and one-half ticks), and 1.95 index points (\$487.50 also known as nineteen and one-half ticks).

Each leg of a combination trade of options contracts shall be traded at a price conforming to the minimum fluctuation. Notwithstanding, options in a combination trade can be traded at an increment of .05 index points regardless of the premium level if the net premium of the options combination is at or below 5.00 index points.

For the purpose of this rule, an option box spread is defined to be a spread of four (4) options: buy call at strike 1, sell put at strike 1, sell call at strike 2 and buy put at strike 2, all with the same expiration date. For an option box spread trade the minimum fluctuation shall be 0.05 (\$12.50, also known as one-half tick) index points.

[The remainder of Chapter 351A remains unchanged.]

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Chapter 351A
Options on Standard and Poor's 500 Stock Price Index™ Futures

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