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OFFICE OF THE SECRETARIAT
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September 8, 2010

Mr. David Stawick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Security Futures Products Rule Submission and Rule Certification
Revisions to OneChicago Rules for Contract Adjustments

Dear Mr. Stawick:

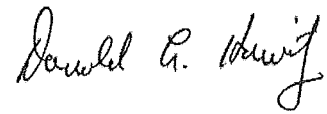
Pursuant to section 5c(c)(1) of the Commodity Exchange Act, as amended (the "Act"), and section 41.24 of the regulations promulgated by the Commission under the Act, submitted herewith is a Rule Change to OneChicago, LLC ("OneChicago" or "OCX") **Rule 902(i) Contract Adjustments**. This proposed Rule revision is necessary to make it clear that OneChicago may designate a class of security futures contracts that will be adjusted for cash dividends or distributions. Currently OneChicago products are not, ordinarily, adjusted for such routine dividends or distributions. In addition, OCX is simultaneously filing with the Commission proposed Amendment No. 1 to the Security Futures Agreement For Clearing and Settlement Services between OneChicago and The Options Clearing Corporation ("OCC") (hereinafter "Amendment No.1").

OCC has filed a Rule change with the Securities and Exchange Commission (SR-OCC-2010-13) (with a copy to the Commission) to accommodate the contract adjustments for this product. Additionally, both the National Futures Association and FINRA have filed Rules changes with both the CFTC and the Securities and Exchange Commission amending the Securities Futures Disclosure Document to reflect the contract adjustments for the OCX.NoDiv product. OneChicago intends to offer its so-called "OCX.NoDivTM" product upon approval of the OCC Rule change by the SEC.¹ OneChicago will file a new product listing with the Commission prior to offering any OCX.NoDiv products.

The proposed Rule revisions are included as Attachment A. Deleted text is shown by a strikethrough (---) and new text is underlined (____). These amendments will become effective on upon approval of the OCC's Rule filing with the SEC.

¹ See Federal Register, Vol. 75, No. 172, September 7, 2010.

On behalf of OneChicago, I hereby certify that the amendment complies with the Act and the regulations promulgated thereunder.



Donald L. Horwitz
Managing Director and
General Counsel
OneChicago, LLC

Encl: Attachments A

RULE AMENDMENTS

902. Contract Specifications

(a) – (h). [No changes.]

(i) *Contract Adjustments.* Adjustments to Single Stock Futures related to actions or transactions by or affecting the issuer of the Underlying Securities shall be made under the circumstances and in the manner from time to time prescribed by the Clearing Corporation. The Exchange may designate a class of security futures contracts that shall be adjusted for the aggregate amount of all cash dividends or distributions and shall be reported by the Exchange to the Clearing Corporation as prescribed in their By-Laws.

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