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OFFICE OF THE SECRETARIAT

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September 18, 2009

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

Re: Change in Trading Units and Position Limits of Security Futures Products

Dear Mr. Stawick:

OneChicago, LLC ("OneChicago") hereby submits a Change in Trading Units and Position Limits of Security Futures Products for three new product rule certifications filed with the Commodity Futures Trading Commission ("Commission") on April 16, 2008 and May 1, 2008 respectively. We hereby modify the Trading Units and Position Limits as follows:

Ticker Symbol	Supplement Number	Position Limits		Trading Unit	
		Current	Change to	Current	Change to
IBB	741	1,350	13,500	1000	100
DUG	780	1,350	13,500	1000	100
EEB	781	1,350	13,500	1000	100

On behalf of OneChicago, I hereby certify that Supplement Numbers 741, 780 and 781 to OneChicago Rule 905, as corrected in this letter, comply with the conditions for trading set forth in Section 41.25 of the regulations promulgated by the Commission under the Commodity Exchange Act ("Act"), and complies with the Act and the regulations thereunder.

If you have any questions or concerns please contact Shahe Alexanian at 312-424-8522.

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

cc: Thomas G. McCabe