



C.F.T.C.
OFFICE OF THE SECRETARIAT

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September 20, 2010

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

**RE: Revisions to Rule 505 ("Booth and Floor Privileges")
CME/CBOT/NYMEX/COMEX Submission No. 10-264**

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME"), The Board of Trade of the City of Chicago, Inc. ("CBOT"), The New York Mercantile Exchange, Inc. ("NYMEX") and Commodity Exchange Inc. ("COMEX") (collectively, the "Exchanges") hereby notify the Commodity Futures Trading Commission that they are adopting amendments to Rule 505 ("Booth and Floor Privileges"). The last paragraph of the Rule has been amended to clarify that industry registrants may not operate from booth space on the trading floor unless they are members or member firms or wholly owned by members or member firms. The current language prohibits such nonmember registrants from soliciting business; the changes clarify that the intent of the rule is to prohibit solicitation and the facilitation of the execution of orders on behalf of such nonmember industry registrants.

Additionally, CME and CBOT Rule 505 has been amended to clarify that booth space on the CME and CBOT trading floors may be assigned only to clearing member firms. CME and CBOT clearing member firms that are assigned booth space may allow it to be used by their employees, members they qualify or member firms with which they have a clearing relationship with respect to exchange products.

The text of the amendments appears on the next page, with additions underscored and deletions overstruck. The amendments will become effective on Wednesday, September 22, 2010.

The Exchanges certify that the amendments comply with the Act and regulations thereunder.

If you have any questions, please contact Robert Sniegowski, Market Regulation, at 312.341.5991 or me at 312.648.5422. Please reference CME/CBOT/NYMEX/COMEX Submission No. 10-264 in any related correspondence.

Sincerely,

/s/ Stephen M. Szarmack
Regulatory Counsel

CME and CBOT Rule 505. BOOTH AND FLOOR PRIVILEGES

Booth space on the trading floor may be assigned only to ~~members and clearing~~ member firms. Available booth space will be assigned by Exchange staff in accordance with the policies established by the Exchange and the decisions of Exchange staff regarding the assignment of booth space shall be final. Clearing member firms may allocate assigned booth space to 1) members qualified by the clearing member firm or 2) member firms with which it has a clearing relationship with respect to exchange products.

Orders may be accepted at or relayed from the booth space assigned to a clearing member ~~or member firm~~ or allocated to a ~~member or member firm by the clearing member firm~~ only by ~~the member, employees of the member, or member firm~~ clearing member firm and members qualified by the clearing member firm.

Notwithstanding any other rule, any member who is associated as a partner, shareholder, member, officer, manager, employee, or consultant with any entity or natural person that is or should be registered as an Introducing Broker ("IB"), Futures Commission Merchant ("FCM"), Commodity Trading Advisor ("CTA") or Commodity Pool Operator ("CPO") as those terms are defined in Section 1a of the Commodity Exchange Act and/or 17 C.F.R. 1.3, may not solicit orders of others from the floor of the Exchange unless the entity or natural person for which or for whom the member is soliciting orders is also a member firm or member of the Exchange. Additionally, IBs, FCMs, CTAs and CPOs may not operate from booth spaces on the trading floor unless they are member firms or wholly owned by members or member firms.

NYMEX and COMEX Rule 505. BOOTH AND FLOOR PRIVILEGES

Booth space on the trading floor may be assigned only to members and member firms. Available booth space will be assigned by Exchange staff in accordance with the policies established by the Exchange and the decisions of Exchange staff regarding the assignment of booth space shall be final.

Orders may be accepted at or relayed from the booth space assigned to a member or member firm only by the member, employees of the member or member firm and members qualified by the member firm.

Notwithstanding any other rule, any member who is associated as a partner, shareholder, member, officer, manager, employee, or consultant with any entity or natural person that is or should be registered as an Introducing Broker ("IB"), Futures Commission Merchant ("FCM"), Commodity Trading Advisor ("CTA") or Commodity Pool Operator ("CPO") as those terms are defined in Section 1a of the Commodity Exchange Act and/or 17 C.F.R. 1.3, may not solicit orders of others from the floor of the Exchange unless the entity or natural person for which or for whom the member is soliciting orders is also a member firm or member of the Exchange. Additionally, IBs, FCMs, CTAs and CPOs may not operate from booth spaces on the trading floor unless they are member firms or wholly owned by members or member firms.