



October 28, 2010

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

RE: CME & CBOT Market Regulation Advisory Notice RA1008-3

CME/CBOT Submission No. 10-312

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME") and The Board of Trade of the City of Chicago, Inc. ("CBOT") (collectively, the "Exchanges") hereby notify the Commodity Futures Trading Commission that they will issue CME & CBOT Market Regulation Advisory Notice RA1008-3 on November 1, 2010. The Advisory Notice reminds market participants that they must accurately identify block trades executed as inter-commodity spreads as spreads when reporting and/or submitting such trades to the Exchange and clarifies that the false identification and reporting of such trades as outright transactions for the purpose of avoiding the requirement in non-Short Term Interest Rate products that each leg of the spread meets the larger of the threshold requirements is a violation of Rule 526 ("Block Trades") and may also be considered uncommercial conduct detrimental to the welfare of the exchange pursuant to Rule 432 ("General Offenses").

A copy of the Advisory Notice appears on the next page of this submission. The Exchanges certify that the Advisory Notice complies with the Commodity Exchange Act and regulations thereunder.

If you have any questions regarding the Advisory Notice, please contact Robert Sniegowski, Market Regulation, at 312.341.5991 or me at 312.648.5422. Please reference CME & CBOT Submission No. 10-312 in any related correspondence.

Sincerely,

/s/ Stephen M. Szarmack Regulatory Counsel

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MARKET REGULATION ADVISORY NOTICE

Exchange

CME & CBOT

Subject

Minimum Quantity Requirements for Inter-Commodity Futures Spread

Block Trades

Rule References

Rule 526

Advisory Date

October 25, 2010

Advisory Number

CME & CBOT RA1008-3

This Advisory Notice is being issued to remind market participants that CME & CBOT inter-commodity futures spreads executed as block trades must 1) be in products which are block-eligible and 2) meet the minimum quantity requirements set forth in CME & CBOT Market Regulation Advisory Notice RA1006-3 from October 19, 2010 (http://www.cmegroup.com/rulebook/files/CME_CBOT_RA1006-3.pdf).

The minimum quantity requirements for CME & CBOT inter-commodity futures spreads executed as block Trades are set forth below.

In Short Term Interest Rate ("STIR") futures (Eurodollars, Eurodollar E-minis, T-Bills, OIS, One-Month Eurodollar, Euroyen and 30-Day Fed Funds) inter-commodity futures spreads may be executed as block trades provided that the sum of the legs of the spread meets the larger of the threshold requirements for the underlying products.

In all products excluding Short Term Interest Rate futures, inter-commodity futures spreads may be executed as block trades only if the quantity of <u>each</u> leg of the spread meets the <u>larger</u> of the threshold requirements for the underlying products.

For example, the minimum block trade quantity thresholds for CBOT 10-Year Notes and CBOT 30-Year Treasury Bonds during RTH are 5,000 and 3,000 contracts, respectively. Therefore, a block trade in the NOB spread (10 Year Note/30 Year Bond spread) can be executed only if the quantity of <u>each</u> leg is at least 5,000 contracts.

Market participants are reminded that they must accurately identify block trades executed as spreads when reporting and/or submitting such trades to the exchange. The false identification and reporting of inter-commodity block spread trades to the exchange as outright transactions for the purpose of avoiding the requirement in non-STIR products that each leg of the spread meets the larger of the threshold requirements is a violation of Rule 526 ("Block Trades") and may also be considered uncommercial conduct detrimental to the welfare of the exchange pursuant to Rule 432 ("General Offenses"). Violations of these requirements will result in disciplinary action.

Questions regarding this Advisory Notice may be directed to one of the following individuals in Market Regulation:

Colin Garvey, Lead Investigator, 312.435.3656

Robert Sniegowski, Associate Director, Rules & Regulatory Outreach, 312.341.5991 Erin Schwartz, Senior Rules & Regulatory Outreach Specialist, 312.341.3083

For media inquiries concerning this Advisory Notice, please contact CME Group Corporate Communications at 312.930.3434 or news@cmegroup.com.