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OFFICE OF THE SECRETARIAT
2009 NOV 23 PM 3 45

November 23, 2009

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

**RE: CME Position Limit, Position Accountability & Reportable Level
Table
CME Submission No. 09-284**

Dear Mr. Stawick:

Chicago Mercantile Exchange Inc. ("CME" or "Exchange") hereby notifies the Commodity Futures Trading Commission that it has adopted amendments to the Position Limit, Position Accountability and Reportable Level Table set forth in the Interpretations & Special Notices Section of Chapter 5 of the CME Rulebook. The changes clarify the treatment of various sized FX contracts, including the recently launched e-micro FX contracts, for purposes of calculating IMM futures equivalents for purposes of position accountability.

The Exchange certifies that the amendments comply with the Commodity Exchange Act and regulations thereunder and are effective immediately.

If you have any questions regarding the Advisory Notice, please contact Gerard O'Connor, Market Regulation, at 312.341.7048 or me at 312.648.5422. Please reference CME Submission No. 09-284 in any related correspondence.

Sincerely,

/s/ Stephen M. Szarmack
Director and Associate General Counsel

POSITION LIMIT, POSITION ACCOUNTABILITY AND REPORTABLE LEVEL TABLE

CONTRACT NAME	OPTIONS	SCALE-DOWN SPOT MONTH (1)	SCALE-DOWN SPOT MONTH (2)	SPOT MONTH	SINGLE MONTH	ALL MONTHS COMBINED	POSITION ACCOUNT-ABILITY	REPORT ABLE FUT LEVEL	REPORT ABLE OPT LEVEL
CME Foreign Exchange									
Australian Dollar	Y						**6,000 *(A)	200	****200
Australian Dollar/Canadian Dollar							**6,000	25	
Australian Dollar/Japanese Yen							**6,000	25	
Australian Dollar/New Zealand							**6,000	25	
Brazilian Real	Y				*24,000	*40,000		25	25
British Pound	Y						**10,000 *(A)	200	****200
British Pound/Japanese Yen							**6,000	25	
British Pound/Swiss Franc							**6,000	25	
Canadian Dollar	Y						**6,000 *(A)	200	****200
Canadian Dollar/Japanese Yen							**6,000	25	
Chinese Renminbi/Euro FX	Y			2,000			**6,000	25	25
Chinese Renminbi/Japanese Yen	Y			2,000			**6,000	25	25
Chinese Renminbi/US Dollar	Y			2,000			**6,000	25	25
Czech Koruna	Y			2,000			**6,000	25	25
E-micro FX (each currency pair)							*(A)	250	
E-mini Euro FX							*(A) 20,000	25	
E-mini Japanese Yen							*(A) 20,000	25	
Euro FX	Y						**10,000 *(A)	200	****200
Euro FX/Australian Dollar							**6,000	25	
Euro FX/British Pound	Y						**6,000	25	25
Euro FX/Canadian Dollar							**6,000	25	
Euro FX/Czech Koruna	Y			2,000			**6,000	25	25
Euro FX/Hungarian Forint	Y			2,000			**6,000	25	25
Euro FX/Japanese Yen	Y						**6,000	25	25
Euro FX/Norwegian Krone							**6,000	25	
Euro FX/Polish Zloty	Y			2,000			**6,000	25	25
Euro FX/Swedish Krona							**6,000	25	
Euro FX/Swiss Franc	Y						**6,000	25	25
Euro FX/Turkish Lira				2,000			**6,000	25	
Hungarian Forint	Y			2,000			**6,000	25	25
Israeli Shekel	Y			2,000			**6,000	25	25
Japanese Yen	Y						**10,000 *(A)	200	****200
Korean Won	Y			2,000			**6,000	25	25
Mexican Peso	Y			***20,000			**6,000	25	25
New Zealand Dollar	Y						**6,000	25	25
Norwegian Krone							**6,000	25	
Polish Zloty	Y			2,000			**6,000	25	25
Russian Ruble	Y			2,000		*10,000		25	25
South African Rand	Y			5,000			**6,000	25	25
Swedish Krona							**6,000	25	25
Swiss Franc	Y						**10,000 *(A)	200	****200

Swiss Franc/Japanese Yen						**6,000	25
Turkish Lira			2,000			**6,000	25

*(A) E-mini Euro FX and the E-mini Japanese Yen are deemed to be the equivalent of one-half (.50) of the Euro FX and Japanese Yen contract.

*Net futures equivalents (NFE) long or short.

** Position Accountability rule: A person owning or controlling more than the specified number of futures or futures equivalent contracts net long or short in all contract months combined shall provide, in a timely fashion, upon request by the Exchange, information regarding the nature of the position, trading strategy, and hedging information if applicable

*** Mexican Peso spot month position limits go into effect beginning on the third business day prior to the termination of trading day.

****For those foreign exchange options products showing a reportable level of 200 contracts, that level is applicable solely to quarterly and serial American style premium quoted options in those products. All other foreign exchange options, including weekly American style premium quoted options, European style premium quoted options and volatility quoted options maintain a reportable level of 25 contracts.

*(A) Full-size IMM Futures Equivalents: Futures, options on futures, e-mini futures and e-micro futures shall be aggregated to the standard full-sized CME Group FX contract regardless of quoting convention. Products that are denominated in a base currency differing from that of the full-sized contract will be converted into common terms using the prior day's settlement, and the resulting notional value translated into full-sized contract equivalents.