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December 17, 2008

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

**RE: CBOT Chapter 6 ("Arbitration")
 CBOT Submission No. 08-204**

Dear Mr. Stawick:

The Board of Trade of the City of Chicago, Inc. ("CBOT") hereby notifies the Commission that it is deleting the introductory note at the beginning of CBOT Chapter 6 ("Arbitration"). The introductory note indicated that all arbitration claims filed prior to November 29, 2007, the date on which CBOT adopted arbitration rules harmonized with Chicago Mercantile Exchange, Inc. arbitration rules, would continue to be governed by the rules in former CBOT Chapter 6 ("Arbitration of Member Controversies"). Given that all CBOT arbitration claims filed prior to November 29, 2007, have been resolved, the introductory note is no longer necessary.

The pertinent section of CBOT Chapter 6 is attached, with deletions overstruck.

CBOT certifies that this change complies with the Commodity Exchange Act and regulations thereunder.

If you have any questions regarding this matter, please contact Robert Sniegowski, Associate Director, Market Regulation Department, at 312.341.5991 or me at 312.648.5422. Please reference CBOT Submission No. 08-204 in any related correspondence.

Sincerely,

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

Chapter 6 Arbitration

[Arbitrations that were filed prior to November 29, 2007, will continue to be governed by the Rules and Regulations in former CBOT Chapter 6.]

[The remainder of the Chapter is unchanged.]