

May 2, 2014

VIA E-MAIL

Ms. Melissa Jurgens
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

Re: CFTC Regulation 40.6(a) Certification. Notification Regarding Amendments to Implementation of Variable Price Limits for Grain and Oilseed Futures Contracts. CBOT Submission No. 14-153

Dear Ms. Jurgens:

On April 18, 2014, the Commodity Futures Trading Commission (“CFTC” or “Commission”) approved the Board of Trade of the City of Chicago, Inc.’s (“CBOT” or “Exchange”) proposed rule amendments to implement variable price limits for grain and oilseeds futures and to eliminate price limits on grain and oilseeds options. (See CBOT Submission No. 14-062 dated February 28, 2014).

CBOT is notifying the CFTC that it is amending corrections to the last month in a crop year that can trigger expanded limits for Soybean, Soybean Oil, Soybean Meal, Oat, and Rough Rice futures, which were incorrectly specified in CBOT Submission No. 14-062. These amendments are shown in blackline format in Appendix A attached herewith and will be effective for trade date May 19, 2014.

CBOT business staff and the Exchange Legal Department collectively reviewed the designated contract market core principles (“Core Principles”) as set forth in the Commodity Exchange Act (“Act” or “CEA”). During the review, Exchange staff identified that the proposed changes may have some bearing on the following Core Principles:

- Compliance with Rules – The aforementioned rule amendments and changing daily price limits mechanism will not affect the Exchange’s ability to assure compliance with rules and conduct market surveillance obligation under the Act. The Exchange has appropriate systems, policies and procedures in place to address the new price limits mechanism.
- Prevention of Market Disruption – Appropriate price limits establish boundaries that allow the market to reflect and adjust to shocks and major price moves without becoming intrusive and regularly disrupting trade.
- Availability of General Information – The Exchange will publish the price limits mechanism information in grain and oilseeds futures terms and conditions, trading rules and specifications on its website. In addition, the Exchange has released Special Executive Report (SER-7081 dated April 29, 2014) to notify the marketplace of the aforementioned amendments.
- Execution of Transactions – Appropriate price limits allow the futures price discovery process to function satisfactorily while still providing time for reflection during periods of high volatility.

- Trade Information – The amendments and new price limits mechanism will not affect the Exchange’s ability to record and store identifying trade information in order to assist in the prevention of customer and market abuses.
- Protection of Market Participants – The Exchange will continue to monitor all market participants to prevent any abusive practices and to assure equitable trading for all users.

The Exchange certifies that these amendments comply with the Act, including regulations under the Act. The Exchange is not aware of any substantive opposing views to this proposal.

The Exchange certifies that this submission has been concurrently posted on the CME Group website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2200, or via e-mail at Christopher.Bowen@cmegroup.com.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachment: Appendix A – Amendments to CBOT Rulebook

Appendix A

CBOT Rulebook Amendments

(Additions are underlined and deletions are ~~overstruck~~)

Chapter 11 Soybean Futures

11102. TRADING SPECIFICATIONS 11102.D. Daily Price Limits

There shall be no trading in Soybean futures at a price more than the initial price limit above or below the previous day's settlement price. Should two or more Soybean futures contract months within the first seven listed non-spot contracts (or the remaining contract month in a crop year, which is the ~~September~~ August contract) settle at limit, the daily price limits for all contract months shall increase by 50 percent the next business day, rounded up to the nearest 5 cents per bushel. If no Soybean futures contract month settles at the expanded limit the next business day, daily price limits for all contract months shall revert back to the initial price limit the following business day. There shall be no price limits on the current month contract on or after the second business day preceding the first day of the delivery month.

Chapter 12 Soybean Oil Futures

12102. TRADING SPECIFICATIONS 12102.D. Daily Price Limits

There shall be no trading in Soybean Oil futures at a price more than the initial price limit above or below the previous day's settlement price. Should two or more Soybean Oil futures contract months within the first eight listed non-spot contracts (or the remaining contract month in a crop year, which is the ~~October~~ September contract) settle at limit, the daily price limits for all contract months shall increase by 50 percent the next business day, rounded up to the nearest 0.5 cents per pound. If no Soybean Oil futures contract month settles at the expanded limit the next business day, daily price limits for all contract months shall revert back to the initial price limit the following business day. There shall be no price limits on the current month contract on or after the second business day preceding the first day of the delivery month.

Chapter 13 Soybean Meal Futures

13102. TRADING SPECIFICATIONS 13102.D. Daily Price Limits

There shall be no trading in Soybean Meal futures at a price more than the initial price limit above or below the previous day's settlement price. Should two or more Soybean Meal futures contract months within the first eight listed non-spot contracts (or the remaining contract month in a crop year, which is the ~~October~~ September contract) settle at limit, the daily price limits for all contract months shall increase by 50 percent the next business day, rounded up to the nearest 5 dollars per ton. If no Soybean Meal futures contract month settles at the expanded limit the next business day, daily price limits for all contract months shall revert back to the initial price limit the following business day. There shall be no price limits on the current month contract on or after the second business day preceding the first day of the delivery month.

Chapter 15
Oat Futures

15102. TRADING SPECIFICATIONS

15102.D. Daily Price Limits

There shall be no trading in Oat futures at a price more than the initial price limit above or below the previous day's settlement price. Should two or more Oat futures contract months within the first five listed non-spot contracts (or the remaining contract month in a crop year, which is the ~~September~~ May contract) settle at limit, the daily price limits for all contract months shall increase by 50 percent the next business day, rounded up to the nearest 5 cents per bushel. If no Oat futures contract month settles at the expanded limit the next business day, daily price limits for all contract months shall revert back to the initial price limit the following business day. There shall be no price limits on the current month contract on or after the second business day preceding the first day of the delivery month.

Chapter 17
Rough Rice Futures

17102. TRADING SPECIFICATIONS

17102.D. Daily Price Limits

There shall be no trading in Rough Rice futures at a price more than the initial price limit above or below the previous day's settlement price. Should two or more Oat futures contract months within the first six listed non-spot contracts (or the remaining contract month in a crop year, which is the ~~September~~ July contract) settle at limit, the daily price limits for all contract months shall increase by 50 percent the next business day, rounded up to the nearest 5 cents per hundredweight. If no Rough Rice futures contract month settles at the expanded limit the next business day, daily price limits for all contract months shall revert back to the initial price limit the following business day. There shall be no price limits on the current month contract on or after the second business day preceding the first day of the delivery month.