



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

September 18, 2013

Via E-mail

Mr. James A. Mehling  
Chief Financial Officer of Mount Lucas Management LP  
on behalf of MLM Index Fund  
405 South State Street  
Newtown, PA 18940

**Re: MLM Index Fund**  
**Form 10-K for the fiscal year ended December 31, 2012**  
**Filed February 27, 2013**  
**File No. 0-49767**

Dear Mr. Mehling:

We have reviewed your filing and have the following comment. In our comment, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter within ten business days by amending your filing, by providing the requested information, or by advising us when you will provide the requested response. If you do not believe our comment applies to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your filing and the information you provide in response to our comment, we may have additional comments.

Form 10-K for the fiscal year ended December 31, 2012

General

1. We note your correspondence filing dated January 20, 2011 and we are unable to locate how you have clarified your disclosure in Item 9A of your 2012 Form 10-K such that the scope of your evaluation and conclusion related to the effectiveness of disclosure controls and procedures as well as the scope of your certifications applies at the series level as well as to the trust as a whole. Please amend your filing on Form 10-K to address these matters.

We urge all who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes the information the Securities Exchange Act of 1934 and all applicable Exchange Act rules require. Since the company and its management are in

possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In responding to our comments, please provide a written statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filing; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

You may contact Howard Efron, Staff Accountant, at (202) 551-3439 or me at (202) 551-3629 if you have questions regarding comments on the financial statements and related matters.

Sincerely,

/s/ Kevin Woody

Kevin Woody  
Branch Chief