



DIVISION OF
CORPORATION FINANCE

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

October 10, 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 completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or 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. We urge all persons 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 rules require.

Sincerely,

/s/ Kevin Woody

Kevin Woody
Branch Chief