SR-CBOE-2006-106 126

February 19, 2007

Nancy M. Morris Secretary, Securities and Exchange Commission 100 F. Street NE Washington, DC 20549-1090

Dear Ms. Morris:

As a 35 year member of the Chicago Board of Trade, I am deeply concerned about the Chicago Board Options Exchange's intention to terminate my CBOE right. Being a CBOT member during the period when the CBOE was conceived, established, and nutured by CBOT members (having gone to the CBOE floor myself to provide liquidity) I am disappointed by the CBOE position that, due to the merger with CME Holdings, CBOT members no longer have a CBOE right. When I make a stock or commodity trade and the price goes against me, I don't back out of the trade in order to realize a better price. I have entered into a contractual agreement with the other party. Nor should the CBOE be able to back out of their contractual agreement with the CBOT in order to realize a greater gain. I would hope that the SEC perceives the CBOE effort for what it is- to enrich it's own members at the expense of CBOT members. The CBOE has acknowledged the CBOE right by puchasing said rights and the CME merge does not jeopardize this. The disagreement between the CBOT and the CBOE should be decided by the courts on a contractual basis and not by the SEC. I strongly urge the SEC not to approve the CBOE proposed rule change that would terminate my CBOE right. Thank you for your consideration in this matter.

Respectfully submitted,

the Million

Thomas M. Myron