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OFFICE OF THE SEC

February 18, 2007

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

Re: "File No. SR-CBOE-2006-106"

In the late 1960's a group of Chicago Board of Trade (CBOT) members decided to form a stock options exchange that would capitalize on a market that was beginning to show signs of growth. These CBOT members raised money, bought and sold memberships, and lent the stock charter licensed to the CBOT to this new exchange. Due to the efforts of these CBOT members the Chicago Board of Options Exchange (CBOE) was created.

From the inception of this exchange until today, CBOT members have traded on or have leased trading rights to individuals who trade on the CBOE. There is no question without these CBOT members the CBOE would not have been conceived, nor would it have achieved the success it enjoys today.

Knowing the history of the CBOE, it is very difficult for a CBOT member to understand how the rights and privileges given to them 34 years ago could be so easily taken away. The CBOE claims if the CBOT merges or is bought by the Chicago Mercantile Exchange (CME) the CBOT members will lose their trading rights at the CBOE. There are no legal documents or any verbal agreements in the history of these two exchanges that state the trading right will be taken away from CBOT members if they merge or are acquired by another exchange. The rights granted to the creators of an exchange cannot be dissolved if it is not written in the by laws or rules. In the history of the CBOT and CBOE these rights can be given up or sold, but they cannot be taken from the owner unless it is at sometime stated in the rules of the exchanges. The CBOE has arbitrarily dissolved the CBOT members trading right without any grounds or justification.

As a CBOT member for 27 years, I sincerely hope this problem can be resolved fairly and both exchanges can move on to the more important issues facing us in the future.

Sincerely,



Kelly A. Caloia  
CBOT Full Member