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November 2, 2007

Via Electronic Mail

Mr. Richard Holley III
Special Counsel
Division of Market Regulation
Securities and Exchange Commission
100 F Street, N.E.
Mail Stop Room 6628
Washington, D.C. 20549

Re: SR-CBOE-2006-106

Dear Richard:

I am writing in response to your request that Chicago Board Options Exchange, Incorporated ("CBOE") provide the following supplemental information in connection with the above-referenced rule filing:

- (1) the number of CBOE memberships on May 1, 1975, or the closest date thereto for which CBOE has this information, including the number of memberships on that date that were transferable memberships and the number of memberships on that date that were exerciser memberships pursuant to Article Fifth(b) of the CBOE Certificate of Incorporation; and
- (2) the number of current CBOE memberships, including the number of those memberships that are transferable memberships and the number of those memberships that are temporary memberships pursuant to CBOE Rule 3.19.01.

CBOE has been unable to locate records that reflect with certainty the number of CBOE memberships on May 1, 1975. The closest date to May 1, 1975 for which CBOE has been able to locate records that CBOE believes can be relied upon to establish this information is June 30, 1975. Specifically, CBOE has financial statements as of June 30, 1975, the end of its then fiscal year, which set forth this information as of that date. Accordingly, the information provided in response to your first information request above is provided as of June 30, 1975.

The number of CBOE memberships on June 30, 1975 was 1,025. Of those memberships, 774 were transferable memberships and 251 were exerciser memberships. For your reference, the number of CBOE memberships at the end of CBOE's prior fiscal year on June 30, 1974 was 567, of which 346 were transferable memberships and 221 were exerciser memberships.

Mr. Richard Holley III

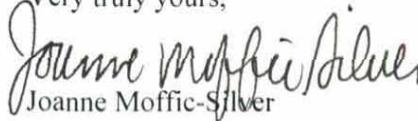
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As of November 2, 2007, the current number of CBOE memberships, as defined under Sections 1.1(b) and 2.1(b) of CBOE's Constitution and CBOE Rule 3.19.01, is 1,179. Of those memberships, 930 are transferable memberships, 222 are temporary memberships, and 27 are CBOE Stock Exchange permits.

Please let me know if you have any questions.

Very truly yours,

A handwritten signature in cursive script that reads "Joanne Moffic-Silver". The signature is written in black ink and is positioned above the printed name.

Joanne Moffic-Silver