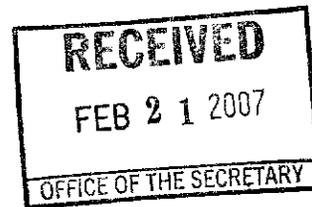


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Thomas E. Nelson
426 Clinton Avenue
Oak Park, Illinois 60302



February 15, 2007

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

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

Dear Ms. Morris and Members of the SEC,

I am a member (B1) of the Chicago Board of Trade. I joined the Exchange in 1969. I was part of the decision to create the Chicago Board Options Exchange. Many of my friends and relatives left the Trading Floor, moved into the Smoking Room, and gave their expertise to the new market.

I voted to have my membership assessed for the purpose of supporting the new venture. When the Membership created the CBOE, we had no concept of being barred from the CBOE. If the hint of a parochial attitude had existed, I would have insisted on the CBOE being closed. The rules and member conduct for the CBOE were established by the members of the Chicago Board of Trade.

The basis of the CBOE contract with the CBOT is simple: consideration, commitment in writing, and a history of execution. At some point the CBOE membership wished to purchase Exercise Rights. This offer is an obvious understanding that the contract exists.

Ms. Morris, I am sure Charley Carey and Bernie Dan have supplied the SEC with all the subsequent agreements between the CBOT and CBOE. The whole issue has overtones of Luke's Prodigal Child. In 1972, both Paul Nelson, my father, and I voted for the right to trade on the Options Exchange. In 1992 Paul's membership was transferred, via inter-family transfer, to me. Both memberships have roots in the 1972 contracts.

The two memberships have been utilized at the CBOE, by way of my agents, for ten years.

I understand the Options Exchange wishes to offer shares to the public, and terminate my access to the market. My right to trade on the CBOE floor or video box is not diminished. I am an original owner-member.

I am requesting the denial of the Chicago Board Options Exchange request to abort the 1972 and subsequent contracts with the Chicago Board of Trade.

Sincerely,

A handwritten signature in cursive script that reads "Thomas E. Nelson".

Thomas E. Nelson