

February 13, 2007

Securities and Exchange Commission  
100 F. Street, NE  
Washington, DC 20549-1090

RECEIVED  
FEB 21 2007  
OFFICE OF THE SECRETARY

Attn: Nancy Morris  
Secretary

Dear Ms Morris,

I find it incredible that there is any question regarding the trading rights of the CBOT members to not have the right to trade in the CBOE. My late husband was one of the members at the time of the onset of the CBOE. I remember him telling me about the new exchange that they started on the trading floor. I think he said they originally started in the cafeteria. He tried it out but after a few times he went back to soybeans. There was no question that this exchange was started by them and for them.

As time went by the CBOE grew and I believe they double decked the CBOT into two floors. The CBOE was on the upper floor. I watched the physical building change so many times in the last 40 years. They not only started it but they paid for the construction. I watched all these changes and all the subsequent changes of the building. They owned it then and they own it now. I own the full membership now.

Sincerely,

*Lynn Sutherland*

Lynn Sutherland  
2213 Butterfly Lane  
Glenview, IL 60026

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