

Subj: **File No. SR-CBOE-2006-106**
Date: 2/12/2007 7:01:23 P.M. Central Standard Time
From: RLupori
To: rule-comments@sec.gov

To whom it may concern,

As a 40 year plus member of the Chicago Board of Trade, I find it very disturbing that the "trading rite" we have had on the CBOE as full CBOT members can be just dissolved by a SEC decision. This "rite" has been upheld by court distinctions here in Illinois. I also find it odd that over the past few years the CBOE was willing to buy back this "rite" from CBOT Full Members, some members did sell, and now the CBOE claims we are not entitled to compensation for this rite, does this make sense to you. Please do not allow the CBOE to take away this "rite" which is legally a part of the CBOT Full Seat.

Sincerely,

Richard D. Lupori
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