

MEMORANDUM

TO: Philadelphia Board of Trade Members and Member Organizations

FROM: Legal Department

DATE: October 4, 2006

RE: SR-PBOT-2006-02: Rule 208, *Disclosure and Trading by Exchange Employees, Directors, and Committee Members*, Rule 324, *Recording of Member Executions*, and Rule 325, *Recording of Customer and Other Member Orders and Executions*

The Philadelphia Board of Trade (“PBOT”) has filed with the Commodity Futures Trading Commission SR-PBOT-2006-02, amendments to Rule 208, *Disclosure and Trading by Exchange Employees, Directors, and Committee Members*, Rule 324, *Recording of Member Executions*, and Rule 325, *Recording of Customer and Other Member Orders and Executions*, as set forth below.

These rule amendments will be effective on October 6, 2006.

If you have any questions regarding these rule amendments, please contact Carla Behnfeldt, Director and Counsel, at (215) 496-5208.

New language is underlined.

Rule 208.

Disclosure and Trading by Exchange Employees, Consultants, Directors and Committee Members

(a) – (d) *No Change.*

(e) For purposes of this Rule 208 the term “employee” shall include any consultant hired by the Exchange.

*** Commentary: No Change.

Rule 324.
Recording of Member Executions

Every floor member who executes purchases or sales of any commodity interest (including straddles, spreads and combinations executed at a differential) for an account in which he has an interest shall promptly prepare for each such transaction a written record in ink showing the executing member, his clearing member, transaction date, time of execution, commodity interest and the number of contracts purchased or sold and, as applicable, price or premium, delivery month or expiration date, put or call, strike price and such additional information as the Exchange may from time to time require to be included thereon.

Rule 325.
Recording of Customer and Other Member Orders and Executions

(a) No Change.

(b) All records of such orders required to be in writing under paragraph (a) of this Rule shall be written in ink and include:

(1) – (3) No Change.

(c) Every floor member who places an order for the purchase or sale of a commodity interest (including spreads, straddles, and combinations executed at a differential) with another floor member on the Floor must prepare and deliver to such other member prior to the representation of such order in the trading crowd a written record in ink of such order containing the commodity interest, number of contracts, delivery month or expiration date and, as applicable, put or call and strike price at the time he places the order with such other member.