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SIDLEY & AUSTIN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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WRITER'S DIRECT NUMBER
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August 16, 1999

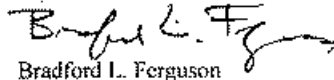
VIA FEDERAL EXPRESS

Secretary of the Senate
Office of Public Records
232 Hart Senate Office Building
Washington, DC 20510

Clerk of the House of Representatives
Legislative Resource Center
B-106 Cannon Office Building
Washington, DC 20515

Enclosed for filing are four (4) Lobbying Reports.

Sincerely,



Bradford L. Ferguson

BLF/pcf
encl.

ODMA\FCDOS\CHICAGO\8475390 August 16, 1999 (11:11am)

Clerk of the House of Representatives
Legislative Resource Center
B-106 Cannon Building
Washington, DC 20515

Secretary of the Senate
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LOBBYING REPORT

Lobbying Disclosure Act of 1995 (Section 5) - All Filers Are Required To Complete This Page

1. Registrant Name Sidley & Austin				
2. Address <input type="checkbox"/> Check if different than previously reported One First National Plaza				
3. Principal Place of Business (if different from line 2) City: Chicago State/Zip for Country: Illinois 60603				
4. Contact Name Bradford L. Ferguson		Telephone (312) 853-2210	E-mail (optional) bferguso@sidley.com	5. Senate ID # 35230-125
7. Client Name <input type="checkbox"/> Self Chicago Mercantile Exchange				6. House ID # 31204018

TYPE OF REPORT 8. Year 1999 Midyear (January 1-June 30) OR Year End (July 1-December 31)

9. Check if this filing amends a previously filed version of this report

10. Check if this is a Termination Report ⇒ Termination Date _____ 11. No Lobbying Activity

INCOME OR EXPENSES - Complete Either Line 12 OR Line 13	
12. Lobbying Firms INCOME relating to lobbying activities for this reporting period was: Less than \$10,000 <input checked="" type="checkbox"/> \$10,000 or more <input type="checkbox"/> ⇒ \$ _____ <small>Income (nearest \$20,000)</small> Provide a good faith estimate, rounded to the nearest \$20,000, of all lobbying related income from the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).	13. Organizations EXPENSES relating to lobbying activities for this reporting period were: Less than \$10,000 <input type="checkbox"/> \$10,000 or more <input type="checkbox"/> ⇒ \$ _____ <small>Expenses (nearest \$20,000)</small> 14. REPORTING METHOD. Check box to indicate expense accounting method. See instructions for description of options. <input type="checkbox"/> Method A. Reporting amounts using LDA definitions only <input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code <input type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code

Signature

Printed Name and Title

Bradford L. Ferguson, Partner

LD-2 (REV. 6/98)

PAGE 1 of 2

Registrant Name: Sidley & Austin Client Name: Chicago Mercantile Exchange

LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Attach additional page(s) as needed.

15. General issue area code Tax (One per page)

16. Specific lobbying issues

Tax matters, including regulations under IRC Sections 475 and 864 regarding tax treatment of trading and dealing activities

17. House(s) of Congress and Federal agencies contacted Check if None
Internal Revenue Service

18. Name of each individual who acted as a lobbyist in this issue area

Name	Covered Official Position (if applicable)	New
<u>Bradford L. Ferguson</u>		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

19. Interest of each foreign entity in the specific issues listed on line 16 above Check if None

Signature: *Bradford L. Ferguson* Date: 8/16/99
Printed Name and Title: Bradford L. Ferguson, Partner