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BY ELECTRONIC TRANSMISSION

Submission No. 18-285

February 2, 2018

Mr. Christopher J. Kirkpatrick
Secretary of the Commission
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

**Re: Amendments to Rules 6.20(i) - Position Limits for Energy Contracts
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6(a)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”) and Commission Regulation 40.6(a), ICE Futures U.S., Inc. (“IFUS” or “Exchange”) hereby self-certifies the amendments to Rule 6.20(i) set forth in Exhibit A. The Exchange is listing new cash-settled Oil Contracts on February 19, 2018. The amendments require any Exchange Clearing Member which holds, controls or carries a ‘reportable position’ in the new Oil Contracts to identify, upon request, the position which such Clearing Member or its customer holds or controls in the corresponding contract month of any physically delivered futures contract to which the Exchange Oil Contract is linked. In addition, the amendments also allow the Exchange to request additional information regarding transactions effected by the Clearing Member or customer in the linked contract. The Rule is similar to Exchange Rule 6.16(c), which applies to Cash-Settled Agricultural Contracts listed by the Exchange.

The Exchange is not aware of any opposing views and certifies that the amendments to Rule 6.20(i), which will become effective on February 19, 2018, comply with the requirements of the Act and the rules and regulations promulgated thereunder. Specifically, the Rule is being amended to comply with Core Principle 3 (Contracts not Readily Subject to Manipulation), as the rule will better enable the Exchange to detect and prevent manipulative behavior. The Exchange further certifies that concurrent with this filing a copy of this submission was posted on the Exchange’s website, which may be accessed at (<https://www.theice.com/futures-us/regulation#Rule-Filings>).

If you have any questions or need further information, please contact me at 212-748-4021 or at jason.fusco@theice.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason V. Fusco". The signature is written in a cursive style with a large, sweeping initial "J".

Jason V. Fusco
Assistant General Counsel
Market Regulation

Enc.
cc: Division of Market Oversight

EXHIBIT A

Rule 6.20. Position Limits, Conditional Limits and Position Accountability for Energy Contracts

(i) The spot month position limits for Oil Contracts shall be effective on the Last Trading Day and the two Business Days preceding the Last Trading Day of the expiring contract, or as otherwise determined by the Exchange to account for holidays. Any Clearing Member which holds, controls or carries for any Customer a 'reportable position' (as such term is used in Rule 6.15) in any Oil Contract shall submit a report to the Exchange upon request, identifying positions which such Clearing Member or its Customer holds or controls in the corresponding contract month of any physically delivered futures contract to which the Exchange contract is linked, as of the open of trading and the close of trading on such Last Trading Day, and shall provide such other information as may be requested by the Exchange regarding transactions effected on such day by such Person in the linked contract, in such form and manner as may be specified by the Exchange.