

March 17, 2016

Submitted via CFTC Portal

Division of Market Oversight  
U.S. Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21st Street, N.W.  
Washington, D.C. 20581

Re: ICAP Global Derivatives Limited – Regulation 40.6 Rule Certification – Revised Fee Schedule

Ladies and Gentlemen:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), ICAP Global Derivatives Limited (“IGDL” or the “SEF”) hereby notifies the Commission that it is publishing a revised discount appendix to its fee schedule (the “Discount Appendix”) revising certain aspects of IGDL’s discount program (the “Program”). IGDL has not revised the fee schedule itself. The revisions to the Program include: clarifying which swaps qualify for inclusion in a certain discount program and adding additional tenors of swaps that may qualify for certain discounts. Other changes are non-material changes such as renaming of certain discount tiers.

A clean copy of the Discount Appendix is attached hereto as Exhibit A, and a copy of the Discount Appendix marked to show changes against the version last submitted to the Commission is attached hereto as Exhibit B. A request for confidential treatment of the Discount Appendix is being simultaneously submitted to the Commission and a copy of that request for confidential treatment is included with this submission.

The revised Discount Appendix will become effective on April 1, 2016.

IGDL certifies that the Program and revised Discount Appendix comply with the requirements of the Act and the rules and regulations promulgated thereunder. IGDL has reviewed the swap execution facility core principles (“Core Principles”) as set forth in the Act and has determined that each of the Program and the Discount Appendix complies with the requirements of impartial access in Core Principle 2 and Commission Regulation 37.202 because all fees and any discounts will be applied on an impartial, fair and non-discriminatory manner, and the Program will be made transparent to all Participants. In compliance with Core Principle 2 and Commission Regulation 37.200, the Program does not incentivize manipulative trading or market abuse or impact IGDL’s ability to perform its trade practice and market surveillance obligations under the Act, and IGDL’s Market Regulation staff will continue to monitor trading to prevent manipulative trading and market abuse. The Program also complies with the requirements for monitoring and trade processing in Core Principle 4 and Commission Regulation 37.401, and the recordkeeping and reporting requirements in Core Principle 10 and Commission Regulations 37.1000 and 37.1001. IGDL has implemented systems to track Program participants’ transactions to ensure proper fee discounts are applied.

IGDL is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a copy of this submission was posted on the IGDL website and may be accessed at:

<http://www.icap.com/what-we-do/global-broking/sef.aspx>.

Please contact the undersigned at (212) 341-9193 with any questions regarding this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Gregory Compa', is written over a light blue horizontal line.

Gregory Compa  
Chief Compliance Officer

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