



55 East 52nd Street
New York, NY 10055

Atlanta Calgary Chicago Houston London New York Singapore

BY ELECTRONIC TRANSMISSION

Submission No. 18-366
June 26, 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 Coffee Resolution No. 1(III) - (Coffee Warehouse Perimeter and Aisle Spacing Requirements) - 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 Commodity Futures Trading Commission (“Commission”) Regulation 40.6(a), ICE Futures U.S., Inc. (“IFUS” or “Exchange”) hereby self-certifies the amendments to Coffee Resolution No. 1(III) set forth in Exhibit A. The amendments change the spacing requirements for certified coffee stored in Exchange licensed warehouses.

Coffee Resolution No. 1(III) currently requires warehouse operators to store exchange licensed coffee a minimum of 24 inches from any walls, with a minimum of 20 inches between piles of coffee. The Exchange is amending this resolution to reduce the spacing requirement for coffee from 24 inches to 18 inches from any wall and the spacing requirement between piles from 20 inches to 18 inches. The amendment aligns the spacing requirements for ICE Futures U.S. Arabica coffee with the spacing requirements for ICE Futures Europe Robusta coffee, as many of the same warehouses are used to store certified stock of both varieties.

The Exchange is not aware of any opposing views and certifies that the amendments to Coffee Resolution No.1 (III), which will become effective on July 13, 2018, comply with the requirements of the Act and the rules and regulations promulgated thereunder. 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 fluid and cursive, with a long, sweeping underline that extends to the left.

Jason V. Fusco
Assistant General Counsel
Market Regulation

Enc.

cc: Division of Market Oversight

EXHIBIT A

Coffee "C" Resolutions No. 1. Warehouse Procedures and Recordkeeping Requirements for the Storage and Loadout of Exchange Coffee

RESOLVED, THAT the following are the minimum acceptable standards and procedures to be followed by Exchange licensed coffee warehouses in connection with the storage of Exchange-certified Coffee.

III. Basic Storage Practices

In order to ensure adequate space for sampling, inspection and effective fire protection, to assist ventilation, to aid in circulation and generally provide ample space for appropriate pest control programs:

1. Coffee shall be stored a minimum of [~~twenty-four~~] eighteen (24 18) inches from any wall
2. A minimum of eighteen [~~Twenty~~] (1820) inches of space shall be maintained between coffee piles. The coffee piles shall be stored in such a manner as to permit at least two (2) faces (front or back and one (1) long side) of each application or Lot to be available for inspection and/or sampling. Coffee shall not be stored higher than five (5) pallets high or one hundred (100) bags high, whichever is less. The equipment aisles should have at least thirteen and one-half (13.5) feet of space for equipment to operate without contacting bags of coffee.

8. Coffee shall be stored in accordance with all applicable local, state, federal or government regulations.