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Submission No. 14-69
July 31, 2014

Ms. Melissa Jurgens
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: Amendments to Rule 6.29
Submission Pursuant to Commission Regulation 40.6(a)

Dear Ms. Jurgens:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commission Regulation 40.6(a), ICE Futures U.S., Inc. ("IFUS" or "Exchange") submits by written certification amendments to Rule 6.29, as set forth in Exhibit A.

Rule 6.29 contains the various exemptions to speculative positions limits which a market participant may seek from the Exchange. The Exchange is making a clarification to the Rule with respect to the grant of non-enumerated hedge exemptions to clarify that such exemptions are not expressly based on the definition of "bona fide hedging transactions and positions" that is contained in Regulation 1.3(z). The amendments specify that applications for non-enumerated hedge exemptions involving contracts other than the Cotton No. 2 contract, must include information that demonstrates the positions are consistent with risk management strategies for the relevant commercial market. The amendments also codify the requirement that non-enumerated hedge exemptions may be granted for the Cotton No. 2 contract only in accordance with CFTC Regulation 1.3(z)(3). Attached as Exhibit B is a draft Exchange Notice which describes the criteria the Exchange uses in evaluating these exemption requests.

The Exchange certifies that the amendments, which will become effective on August 15, 2014, comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. Specifically, Core Principle 5 requires designated contract markets to adopt for each contract, as is necessary and appropriate, position limitations or position accountability for speculators. The amendments codify existing procedures with respect to identifying positions which may be excluded from the speculative position limits established by the Exchange, upon specific application to and approval by the Exchange in a particular case.

The Exchange is not aware of any substantive opposing views that were expressed by members or others with respect to the amendments. The Exchange further certifies that concurrent with this filing a copy of this submission was posted on the Exchange's website at (https://www.theice.com/notices/RegulatoryFilings.shtml).

If you have any questions or need further information, please contact me at (212) 748-4083 or at Audrey.hirschfeld@theice.com

Sincerely,

Audrey R. Hirschfeld
SVP and General Counsel

cc: Division of Market Oversight

EXHIBIT A

Rule 6.29. Exemptions

(a) The position limits for Exchange Futures and Options Contracts specified in this Chapter shall not apply to (i) bona fide hedging positions as defined in Section 1.3(z)(1) of the Regulations under the Act or non-enumerated hedging positions which are otherwise determined by the Exchange to be consistent with the purposes of hedging, (ii) arbitrage, spread or straddle positions [~~or~~] and (iii) risk management positions.

* * * * *

(d) Hedge Exemptions

(i) Requests for bona fide hedge exemptions must include information that demonstrates that the proposed positions are bona fide hedging positions.

(ii) Requests for non-enumerated hedge exemptions must include information that demonstrates the positions are consistent with risk management strategies for the relevant commercial market; *provided, however*, that non-enumerated hedge exemptions pertaining to the Cotton No. 2 contract must comply with the requirements of CFTC Regulation 1.3(z)(3).

[Remainder of Rule Unchanged]

Exhibit B

NOTICE

July 22, 2014

Summary of Content:

Amendments to Rule 6.29--Exemptions

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Amendments to Rule 6.29--Exemptions

Effective August 6, 2014, subject to conclusion of the applicable regulatory review period, amendments to Rule 6.29 clarify the bases on which the Exchange's Market Regulation Department may grant bona fide hedge exemptions from speculative position limits. As provided in amended Rule 6.29(a), Exchange position limits do not apply to bona fide hedging positions as defined in Section 1.3(z)(1) of the CFTC regulations or to non-enumerated hedging positions which are otherwise determined by the Exchange to be consistent with the purposes of hedging.[1]

Applicants seeking exemptions for hedging positions that are not specifically enumerated in CFTC regulations must provide the Exchange with information that demonstrates the positions are consistent with risk management strategies for the relevant commercial market. In addition, the applicant must establish that the positions for which the exemption is sought reflect current obligations. Anticipated obligations will be considered by the Exchange, as appropriate; the factors used when reviewing exemption requests for anticipated obligations include, but are not limited to, the requestor's historical activity in the relevant commercial market and current futures and cash market conditions. In general, the Exchange uses a facts and circumstances approach when reviewing such exemption requests.

The text of the amended Rules follows below. If you would like a copy showing language additions and/or deletions, please contact the Corporate Secretary's Office at (212) 748-4082.

Rule 6.29. Exemptions

(a) The position limits for Exchange Futures and Options Contracts specified in this Chapter shall not apply to (i) bona fide hedging positions as defined in Section 1.3(z)(1) of the Regulations under the Act or non-enumerated hedging positions which are otherwise determined by the Exchange to be consistent with the purposes of hedging, (ii) arbitrage, spread or straddle positions and (iii) risk management positions.

(b) To be eligible for an exemption under this Rule, a Person seeking the exemption must submit to the Exchange a written request, in the form provided by the Exchange, which shall include the following:

(i) a description of the size and nature of the proposed positions;

(ii) a statement that the Person seeking the exemption agrees to comply with whatever restrictions or limitations are imposed by the

[1] Exemptions granted for the Cotton No. 2 contract must comply with the requirements of CFTC Regulation 1.3(z) because it is a product that is subject to Federal position limits.

Exchange with regard to said positions;

(iii) a representation that any applicable Federal requirements relating to the proposed positions have been complied with and that any necessary approvals of the Commission have been obtained;

(iv) a statement that the Person seeking the exemption is in compliance with all other applicable Rules and requirements;

(v) a statement that the Person seeking the exemption agrees to submit immediately a supplemental statement to the Exchange explaining any change in circumstances affecting the positions;

(vi) a statement that such positions will be initiated and liquidated in an orderly manner;

(vii) such further information as the Exchange may request.

Within five (5) Business Days of the submission of the required information and statements, the Exchange shall respond to the request indicating whether the exemption has been granted and the limitations placed thereon. An exemption will remain in full force and effect until (1) a request for withdrawal is received by the Exchange; or (2) the Exchange revokes, modifies or places further limitations thereon.

(c) Written requests for exemptions to the position limits specified in this Chapter must be received by the Exchange no later than five (5**)** Business Days prior to the first (1st) day such position limits are in effect. Failure to file a position limit exemption request on a timely basis shall subject the Person seeking an exemption to disciplinary action pursuant to the Rules.

(d) Hedge Exemptions

(i) Requests for bona fide hedge exemptions must include information that demonstrates that the proposed positions are bona fide hedging positions.

(ii) Requests for non-enumerated hedge exemptions must include information that demonstrates the positions are consistent with risk management strategies for the relevant commercial market, *provided, however*, that non-enumerated hedge exemptions pertaining to the Cotton No. 2 contract must comply with the requirements of CFTC Regulation 1.3(z)(3).

(e) Arbitrage, Spread and Straddle Exemptions

(i) Exemptions may be granted for arbitrage, intercommodity spread, intracommodity spread, and eligible option/option or option/futures spread or straddle positions.

(ii) When applying for a cash and carry exemption, the Person seeking the exemption must provide the cost of carrying the physical commodity, the minimum spread differential at which it will enter into a straddle position in order to obtain profit, and the quantity of stocks currently owned in Exchange licensed warehouses or tank facilities.

(iii) When granted a cash and carry exemption, the Person receiving the exemption shall agree that, (1) before the price of the nearby contract month rises to a premium to the second (2nd) contract month, it will liquidate all long positions in the nearby contract month.

(iv) Block Trades may not be used to establish positions upon which a cash and carry exemption request is based.

(f) Risk Management Exemptions

When applying for a risk management exemption, the Person seeking such exemption must provide an explanation of the positions in the underlying cash market, related cash market, or related over-the-counter market where there exists a close linkage between the Futures or Options market and the underlying market in question, or, where applicable, an explanation of the corresponding commodity index being replicated.