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BY ELECTRONIC TRANSMISSION

Submission No. 15-171
October 13, 2015

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

Re: Amendments to Bylaws--New Definition Section 1.4-Submission Pursuant to Section 5c(c)(1)
of the Act and Regulation 40.6

Dear Mr. Kirkpatrick:

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") is notifying the Commission that it is self-certifying the amendment of the Bylaws to add new Section 1.4. The amendment specifies the applicable governing law for purposes of interpreting the Rules, as set forth in Exhibit A. The amendment will become effective October 27, 2015. The Bylaws and Rules do not expressly indicate the law that should be applied when they are interpreted. The actual terms for many of the Exchange's contracts specify that the contract is made in New York, but the vast majority of the Rules do not indicate any jurisdiction's laws as the interpretative authority. The Bylaws, in contrast, invoke provisions of Delaware law with respect to indemnity and other corporate matters as the Exchange has been a Delaware Corporation since 2007. In order to avoid disagreements over which law may be applicable to a dispute arising under an Exchange contract or other matters related to the Rules, an amendment to the Bylaws has been drafted which clearly states that the Rules of the Exchange (but not the Bylaws) are to be construed under New York law exclusively.

The Exchange is not aware of any substantive opposing views that were expressed by members or others with respect to the Rule 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,

A handwritten signature in blue ink that reads "Audrey R. Hirschfeld". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Audrey R. Hirschfeld
SVP and General Counsel

Enc.
cc: Division of Market Oversight

Exhibit A

**BYLAWS
DEFINITIONS AND INTERPRETATION**

Section 1.1. Capitalized terms used but not defined herein shall have the meanings set forth in the Rules.

Section 1.2. Any reference in these Bylaws to the Delaware General Corporation Law shall be to the Delaware General Corporation Law as it now exists or as it may hereafter be amended.

Section 1.3. To the extent that there is any conflict or inconsistency between the Bylaws and the Rules, the Bylaws shall control.

Section 1.4 The Rules of the Exchange (other than these Bylaws) shall be governed by and construed in accordance with the internal laws of the State of New York, without giving effect to the conflict of laws provisions thereof.