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BY ELECTRONIC TRANSMISSION

Submission No. 18-512
December 13, 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 Block Trade Procedures - Changes to Minimum Block Trade Size
for MSCI Futures and Options- 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 Commodity Futures Trading Commission (“Commission”) Regulation 40.6(a), ICE Futures U.S., Inc. (“IFUS” or “Exchange”) self certifies amendments to the Exchange’s Block Trading Procedures (the “Procedures”), which are reflected in the Exchange’s Block Trade FAQ (“FAQ”), as set forth in Exhibit A. The amendments change the minimum block trade size for all MSCI Index futures and options contracts. The current minimum block sizes for the complex of MSCI Index futures and options contracts range from a high of 100 lots to low of 20 lots. The amendments sets a minimum block size of 50 lots for all MSCI Index contracts, which is the current level for the two most active products, the MSCI EAFE Index and the MSCI Emerging Markets Index. The Exchange is making the change to harmonize the block levels for MSCI Index contracts.

The Exchange is not aware of any opposing views and certifies that the amendments to the FAQ, which will become effective on January 1, 2019, comply with the requirements of the Act and the rules and regulations promulgated thereunder. Specifically, the amendments comply with Core Principle 9, which allows designated contract markets (“DCM”) to authorize transactions, such as block trades, that are executed away from the DCM’s centralized marketplace. The Exchange further certifies that, concurrent with this filing, a notice of pending certification was posted on the Exchange’s website as well as a copy of this submission, which may be accessed at (<https://www.theice.com/futures-us/regulation>).

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 horizontal stroke at the end.

Jason V. Fusco
Assistant General Counsel
Market Regulation

Enc.
cc: Division of Market Oversight

Enc.

EXHIBIT A

ICE FUTURES U.S. BLOCK TRADE FAQ

2. What are the eligible contracts and the minimum threshold quantities for a block trade?

The minimum quantity requirements for block trades of eligible Energy futures and options contracts can be found under the “Energy Forms” tab at [the link below](#):

Energy Futures and Options Block Minimum Sizes

<https://www.theice.com/futures-us/regulation>

Table 1 below lists the eligible agricultural and index futures and options contracts and the minimum quantity requirements for block trades. Table 2 below list the eligible financial contracts and the minimum quantity requirements for block trades and Table 3 lists the eligible metals futures and options contracts and the minimum quantity requirements for block trades.

[Additions are underlined and deletions have been struck through]

TABLE 2 – Financial Contracts

Product	Contract Type	Minimum Quantity
NYSE FANG+™ Index	Futures	20 lots
MSCI Complex:	<u>Futures and Options</u>	<u>50 Lots</u>
—MSCI EAFE Index	<u>Futures</u> <u>Options</u>	50 lots
—MSCI Emerging Markets Index	<u>Futures</u> <u>Options</u>	50 lots
—MSCI USA Index	<u>Futures</u>	400 lots
—MSCI USA Value Index	<u>Futures</u>	400 lots
—MSCI USA Growth Index	<u>Futures</u>	400 lots
—MSCI EAFE NTR Index	<u>Futures</u>	50 lots
—MSCI Emerging Markets NTR Index	<u>Futures</u>	50 lots
—MSCI Europe Index	<u>Futures</u>	400 lots
—MSCI Europe Value Index	<u>Futures</u>	400 lots
—MSCI Europe Growth Index	<u>Futures</u>	400 lots
—MSCI Euro Index	<u>Futures</u>	400 lots
—MSCI Pan Euro Index	<u>Futures</u>	400 lots
—MSCI Canada Index	<u>Futures</u>	400 lots
—MSCI World Index	<u>Futures</u>	400 lots
—MSCI Emerging Markets Latin America Index	<u>Futures</u>	400 lots
—MSCI ACWI Index	<u>Futures</u>	50 lots
—MSCI ACWI Ex US Index	<u>Futures</u>	50 lots
—MSCI Emerging Markets Asia (“EM Asia”) Index	<u>Futures</u>	50 lots

—MSCI ACWI NTR Index	Futures	50 lots
—MSCI ACWI Ex-US NTR Index	Futures	50 lots
—MSCI Emerging Markets Asia (“EM Asia”) NTR Index	Futures	50 lots
—MSCI USA Small Cap Index	Futures	20 lots
—MSCI Emerging Markets NTR (EUR) Index	Futures	20 lots
—MSCI Emerging Markets EMEA NTR Index	Futures	20 lots
—MSCI Emerging Markets Latin America NTR Index	Futures	20 lots
—MSCI China Free NTR Index	Futures	20 lots
—MSCI India NTR Index	Futures	20 lots
—MSCI Mexico NTR Index	Futures	20 lots
U.S. Dollar Index	Futures	75 lots
	Options	25 lots
All Currency Pair	Futures	5 lots
Credit Indices	Futures	2 lots
NYSE Arca Gold Miners Index	Futures	25 lots

[REMAINDER OF ANSWER TO QUESTION 2 UNCHANGED]

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