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**BY ELECTRONIC TRANSMISSION**

Submission No. 18-519  
December 19, 2018

Commodity Futures Trading Commission  
Three Lafayette Centre  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

**Re: Amendments to Sugar Arb Blocks Liquidity Provider Program  
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission (“CFTC”) Regulation 40.6(a), ICE Futures U.S., Inc. (“IFUS” or “Exchange”) hereby submits, by written certification, notice that the Exchange is amending and renaming the Sugar Arb Blocks Liquidity Provider Program (“Program”) as set forth in Exhibit A. The Program is being amended to include Coffee “C” futures contracts. In addition, the Exchange is renaming the Program, which will now be called the Arb Blocks Liquidity Provider Program.

The Program is being amended in connection with recent changes to the Exchange’s block trade procedures, which now provide a lower minimum block size for Coffee “C” futures (Arabica) contracts executed as part of an arbitrage against ICE Futures Europe Robusta futures contracts (see ICE Futures U.S. Submission No. 18-503). The Exchange will now be able to identify Arabica/Robusta arbitrage block trades and believes that the inclusion of Coffee “C” futures contract in the Program will increase liquidity in that market.

The Exchange certifies that the amendments to the Program comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. In particular, the Program continues to comply with Core Principle 4 (Monitoring of Trading), Core Principle 9 (Execution of Transactions) and Core Principle 12 (Protection of Market Participants). The Program does not impact order execution priority or otherwise give participants any execution preference or advantage. In addition, the Exchange’s Market Regulation Department actively monitors for trading abuses using electronic exception reports and will take appropriate action against any participants engaging in market abuses.

The Exchange is not aware of any opposing views with regard to the amendments to the Program, which will become effective on January 7, 2019, and further certifies that, concurrent with this filing, a redacted copy of this submission (consistent with the petition for Confidential Treatment filed contemporaneously with the Commission) was posted on the Exchange's website 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](mailto: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 large initial "J" and a long, sweeping underline.

Jason V. Fusco  
Assistant General Counsel  
Market Regulation

Enc.  
cc: Division of Market Oversight  
New York Regional Office

## **EXHIBIT A**

### **ICE Futures U.S. [Sugar] Arb Blocks Liquidity Provider Program**

#### **Program Purpose**

The purpose of the Program is to incentivize participants to increase liquidity in the arbitrage markets for Sugar No. 11/White Sugar and Coffee “C”/Robusta coffee [~~arbitrage market~~].

#### **Product Scope**

Sugar No. 11 and Coffee “C” futures.

#### **Eligible Participants**

IFUS may designate up to five participants in the Program, who may be Exchange members or non-members. In order to be considered for selection into the Program, potential participants must have maintained a sufficient monthly average volume relative to the Monthly Program Volume threshold in Program contracts over the past three months at the time of application. Notwithstanding the foregoing the Exchange may add or subtract from the aforementioned criteria as it deems necessary.

#### **Program Term**

The Program shall end on June 30, 2019, unless extended by the Exchange. The Exchange reserves the right to amend or end the program and/or to terminate any participant at any time prior to that date.

#### **Obligations**

Participants are required to provide the Exchange with information acceptable to the Exchange detailing Participants’ trading activity under the program, and the Exchange may require an additional third party verification report.

#### **Program Incentives**

[PARAGRAPH REDACTED]

#### **Monitoring and Termination of Status**

The Exchange shall monitor trading activity and Participants’ performance and shall retain the right to revoke Participants’ status if it concludes from review that a Program Participant has failed to meet its obligations or no longer meets the eligibility requirements of this Program.