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New York, NY 10055

**BY ELECTRONIC TRANSMISSION**

Submission No. 18-444A  
September 10, 2018

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

**Re: Amendments to Position Limits and Accountability Levels for Certain Oil Americas  
Futures Contracts  
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6(a)**

Dear Mr. Kirkpatrick:

Pursuant to Commodity Futures Trading Commission (“CFTC” or “Commission”) Regulation 40.6(a), ICE Futures U.S., Inc. (“Exchange”) filed Submission No. 18-444 on August 30, 2018, which provided for amendments to Resolution No. 2 of Chapter 19 of the Exchange’s Rulebook, effective September 17, 2018. As requested by Commission staff, the Exchange provides this Submission as supplementary information to Submission No. 18-444.

The amendments to Resolution No. 2 provided in Exhibit A to Submission No. 18-444 align spot month position limits and single and all-months-combined accountability levels of the Gasoline Diff - RBOB Gasoline 1<sup>st</sup> Line vs Argus Eurobob Oxy FOB Rotterdam Barge Future (“GDO”), Gasoline Diff - RBOB Gasoline 1<sup>st</sup> Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Future (“1F6-1G0”), Gasoline Diff - RBOB Gasoline 1<sup>st</sup> Line vs Argus Eurobob Oxy FOB Rotterdam Barges Mini Future (“GDQ”), Gasoline Diff - RBOB Gasoline 1<sup>st</sup> Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Mini Future (“140-14U”) with the RBOB Gasoline 1<sup>st</sup> Line Future (“RBS”) contract.

Currently the RBOB Gasoline 1<sup>st</sup> Line Future (“RBS”) contract has a contract size of 1,000 barrels and has a spot month position limit of 6,800 contracts, equivalent to 6,800,000 barrels or 285,600,000 gallons, based on 42 gallons per barrel. The differential contracts listed in the preceding paragraph provide for a contract size of 1,000 metric tonnes. A metric tonne is a weight measurement and not a volumetric measurement like gallons. Weight of a liquid is dependent on the specific gravity of the

product identified; therefore, the conversion of gallons to metric tonnes will vary depending on the product measured. RBOB gasoline generally has a specific gravity range of approximately 0.71 - 0.79. As a reference point, water has a specific gravity of 1.00, and equates to approximately 264.17 gallons per metric tonne. Because gasoline has a specific gravity less than water, it requires a larger volume to equal one metric tonne. The Exchange has estimated that volume at 349.86 gallons per metric tonne. This effectively provides for a contract size for the differential contracts referenced of 349,860 gallons.

As an example of the methodology underlying the amendments, the Gasoline Diff - RBOB Gasoline 1<sup>st</sup> Line vs Argus Eurobob Oxy FOB Rotterdam Barge Future ("GDO") contract will have an amended spot month position limit of 816 contracts, 816,000 metric tonnes or, based on the specific gravity of gasoline, approximately 285,485,760 gallons. This generally equates to the spot month position limit of RBOB Gasoline 1<sup>st</sup> Line Future, which has a spot month position limit equal to 285,600,000 gallons.

Based on the foregoing, and as provided in Submission No. 18-444, the Exchange has revised the spot month position limits and single and all-months-combined accountability levels of the differential futures contracts listed above to provide for spot month position limits and single and all-months-combined accountability levels consistent with the RBOB Gasoline 1<sup>st</sup> Line Future ("RBS").

## **Certifications**

The Exchange is not aware of any opposing view to the amendments and certifies that the amendments to position limits comply with the requirements of the Act and the rules and regulations promulgated thereunder. The Exchange has reviewed the designated contract market core principles ("Core Principles") as set forth in the Act and has determined that the amendments comply with the following relevant Core Principles:

### **COMPLIANCE WITH RULES**

The amended spot month position limit and single and all-months-combined accountability levels for the Oil Americas futures contracts are set forth in Resolution No. 2 of Chapter 19 and will be enforced by the Exchange. In addition, trading of these contracts is subject to all relevant Exchange rules which are enforced by the Market Regulation Department.

### **CONTRACTS NOT READILY SUBJECT TO MANIPULATION**

The Exchange's Oil Americas contracts are not readily subject to manipulation as they are based on established and liquid underlying cash markets. In addition, trading of the contracts will continue to be monitored by the Market Regulation Department.

### **POSITION LIMITS OR ACCOUNTABILITY**

Positions in the Oil Americas futures contracts will continue to be subject to position limits set by the Exchange. As described above, such position limits are based upon the existing levels for equivalent contracts currently in effect at the Exchange.

### **FINANCIAL INTEGRITY OF CONTRACTS**

The Oil Americas futures contracts will continue to be cleared by ICE Clear Europe, a registered derivatives clearing organization subject to Commission regulation, and carried by registered futures commission merchants qualified to handle customer business.

The Exchange further certifies that, concurrent with this filing, a copy of this submission was posted on the Exchange's, 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 312-836-6745 or at [patrick.swartz@theice.com](mailto:patrick.swartz@theice.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick Swartz", written in a cursive style.

Patrick Swartz  
Manager  
Market Regulation

Enc.

cc: Division of Market Oversight  
New York Regional Office

**EXHIBIT A**

<b>Rule</b>	<b>Contract Name</b>	<b>Commodity Code</b>	<b>Contract Size</b>	<b>Unit of Trading</b>	<b>Spot Month Limit</b>	<b>Single Month Accountability Level</b>	<b>All Month Accountability Level</b>	<b>Aggregate 1 (Positive Correlation)</b>	<b>Aggregate 2 (Negative Correlation)</b>	<b>Exchange Reportable Level</b>	<b>Trading Ratio</b>
19.C.82	Gasoline Diff – RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barge Future	GDO	1,000	mt	<del>[6,800]</del> 816	<del>[6,800]</del> 816	<del>[6,800]</del> 816	GDO		25	
19.C.83	Gasoline Diff – RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Future	1F6-1G0	1,000	mt	<del>[6,800]</del> 816	<del>[6,800]</del> 816	<del>[6,800]</del> 816	GDO		1	
19.C.84	Gasoline Diff – RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Mini Future	GDQ	100	mt	<del>[68,000]</del> 8,160	<del>[68,000]</del> 8,160	<del>[68,000]</del> 8,160	GDO		25	10 GDQ: 1 GDO
19.C.85	Gasoline Diff – RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Mini Future	140-14U	100	mt	<del>[68,000]</del> 8,160	<del>[68,000]</del> 8,160	<del>[68,000]</del> 8,160	GDO		1	10 140: 1 GDO