



55 East 52nd Street
New York, NY 10055

BY ELECTRONIC TRANSMISSION

Submission No. 18-444
August 30, 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 Position Limits and Accountability Levels for Certain Oil Americas Futures Contracts
Submission Pursuant to Section 5c(e)(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”) hereby certifies amendments to Resolution No. 2 of Chapter 19 of the Exchange’s Rulebook, as set forth in Exhibit A.

Amendments to Position Limits for Certain Financial Power Futures Contracts

The amendments to Resolution No. 2 of Chapter 19 decrease spot month position limits and single and all-months-combined accountability levels for the four Oil Americas futures contracts with contract sizes in metric tons (349,860 gallons) listed below:

- Gasoline Diff - RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barge Future (“GDO”)
- Gasoline Doff - RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Future (“1F6-1G0”)
- Gasoline Diff - RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Mini Future (“GDQ”)
- Gasoline Diff - RBOB Gasoline 1st Line vs Argus Eurobob Oxy FOB Rotterdam Barges Balmo Mini Future (“140 - 14U”)

In all instances, the new levels are equivalent to those currently in effect at the Exchange for materially similar contracts with contract sizes in barrels (42,000 gallons) that reference RBOB Gasoline 1st Line Futures ("RBS") prices. The Exchange will implement the position limit changes on September 17, 2018, effective for all expiration months, including those with open interest.

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.

Sincerely,



Patrick Swartz
Manager
Market Regulation

Enc.

cc: Division of Market Oversight
New York Regional Office

EXHIBIT A

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