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BY ELECTRONIC TRANSMISSION

Submission No. 19-382
December 13, 2019

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: Amendment to Canola Transaction Facilitation Fee
Submission Pursuant to Section 5c(C)(1) of the Act and Regulation 40.6(a)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended (the “Act”) and Commodity Futures Trading Commission (“Commission”) Regulation 40.6(a), ICE Futures U.S., Inc. (“IFUS” or “Exchange”) hereby self-certifies an increase to the Transaction Facilitation Fee charged to canola Delivery Certificate holders. Exchange Rule 12.16 provides that canola Warrant Issuers are entitled to a Transaction Facilitation Fee (or “TFF”) for the performance obligations they agree to upon issuing a Warrant under the Rules. The TFF is collected by the Exchange from the holder of each Delivery Certificate, and is assessed for each calendar day from the date a Delivery Certificate is issued until the date that shipment of canola is complete; the Exchange pays the TFF less a small administration fee to each Warrant Issuer. The current TFF rate, which was set in 2005, is \$0.12 Canadian dollars per tonne per day. The Exchange is increasing the TFF by \$0.03 Canadian dollars to \$0.15 Canadian dollars per tonne per day.

The TFF rate increase was presented to the Canola Committee, which recommended that the Exchange’s Board of Directors adopt the increase. The majority viewed the increased rate as closely reflecting current commercial storage rates in delivery areas, and more closely reflecting storage rates for competing grains. The Committee also determined that it was consistent with Bylaw Section 17.1¹ to make the increase effective for contract months with open interest, because the increase would not have a material effect on the amount of money to be paid or the quality of the merchandise to be received under a Canola contract. Two committee members who opposed the increase expressed the view that there should be no rate increase in the absence of evidence that the current TFF rate was impeding proper

¹ The Bylaw provides in relevant part that: “Unless otherwise provided in the Rules, any alteration of the Rules relating to Commodity Contracts, may, if the Board of Directors so decides, be binding on Commodity Contracts entered into before as well as after its adoption, provided such alteration does not materially affect the amount of money to be paid, or the quality of the merchandise to be received, under such Commodity Contracts, in which case such alteration may only apply with respect to the first delivery or expiration month following the last delivery or expiration month in which there is an open position at the time such alteration becomes effective;...”

convergence at expiration or some other compelling reason. In addition, some members questioned whether the increase could impact the value of calendar spreads involving impacted contract months, and suggested that the increase should not be implemented on contract months with substantial open interest.

The TFF increase was subsequently approved by the Board, with the implementation deferred to the January 2021 futures contract. Open interest in the January 2021 Canola contract and subsequent contract months was 722 lots and represented only 0.37% of total open interest as of the close of business on December 11, 2019.

The Exchange is not aware of any other opposing views and certifies that the increase complies with the requirements of the Act and the rules and regulations promulgated thereunder. To comply with the requirements of core principle 7 the Exchange plans to issue a notice advising participants of the change on Monday, December 16, 2019, which will be available on the Exchange's website. The Exchange further certifies that, concurrent with this filing, a copy of this submission was posted on the Exchange's website, 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 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

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