ICE FUTURES U.S.
World Financial Center
One North End Avenue
New York, New York 10282

BY ELECTRONIC TRANSMISSION

Submission No. 08-23
March 26, 2008

Mr. David A. Stawick
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 Rules 8.53, 9.43, 11.24, 27.19 - 27.21, 27.27, 27.28, 27.30 and Error Policy -**
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6

Dear Mr. Stawick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commission Regulation 40.6, ICE Futures U.S., Inc. ("Exchange") submits, by written certification, amendments to Rules 8.53, 9,43, 11.24, 27.19 - 27.21, 27.27, 27.28, 27.30 and Error Policy, attached as Exhibit A.

The amendments provide for the trading of Options Contracts on the Exchange's electronic trading system. On March 28, 2008, the Exchange will list for electronic trading Options Contracts on Cocoa, Coffee "C"®, Cotton No. 2™, FCOJ-A, Sugar No. 11™, the Russell 1000® Mini Index and the Russell 2000® Mini Index Futures Contracts. The Options Contracts for the five (5) agriculturals will trade both electronically and by open outcry. The Options Contracts for the two Russell Minis will only trade electronically. Only Regular Options Months will be listed for electronic trading. Serial Options Months will only trade by open outcry, except for the two Russell Minis which will only trade electronically and, therefore, will only have Regular Options Months listed for trading. In addition, amendments have been made to the Strike Price rules for Cocoa, Coffee "C" and Sugar No. 11 so that there is only one "prescribed interval" instead of several.

It should be noted that Options Contracts traded electronically will not have Reasonability Limits and No Cancellation Ranges. Rather a calculation will be made using the appropriate option delta, (published by the Exchange on the prior business day), and the price of the underlying futures contract at the time the option trade is executed. The resulting calculation will be used to determine if the premium of the executed option is representative of the value of that option.

The Exchange certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The amendments were made by the President in accordance with Standing Resolution R-7 and will become effective on March 28, 2008. No substantive opposing views were expressed by members or others with respect to the amendments or new trading hours.

If you have any questions or need further information, please contact me at 212-748-4084 or jill.fassler@theice.com.

Sincerely,

Jill S. Fassler
Vice President
Associate General Counsel

cc: Division of Market Oversight
New York Regional Office

(In the text of the amendment below, additions are underlined and deletions are bracketed and lined out.)

Rule 8.53. Strike Prices

* * *

(b) The Strike Prices of Options shall be at levels (the "prescribed levels") set at intervals (the "prescribed intervals") of $.025 [~~commencing at $.025 up to $1.00 per pound, $.05 up to $2.00 per pound, and $.10 at $2.00 per pound and above~~].

(c) Except as the Board or the President may from time to time prescribe otherwise, Coffee Options shall be listed for trading with particular Strike Prices for each Option Month as follows:

(i) At the time Coffee Options for any Regular Option Month are first (1st) listed for trading pursuant to Rule 8.51, they shall be listed with thirteen (13) Strike Prices each for Puts and Calls at the prescribed [~~$.05 or $.10 level plus any intervening~~] $.025 [~~prescribed levels below $1.00. The first (1st) such Strike Price will be set at the prescribed $.05 or $.10 level which is equal to the Settlement Price for the Underlying Futures Contract on the previous trading day, or if such Settlement Price is not equal to any such prescribed level, then at the next such prescribed $.05 or $.10 level above such Settlement Price. The other twelve (12) Strike Prices shall be at each of the six (6) prescribed $.05 or $.10 levels next above and the six (6) prescribed $.05 or $.10 levels next below the first (1st) Strike Price. Thereafter, any intervening $.025 prescribed levels below $1.00 will be inserted. At the time Coffee Options for any Serial Option Month are first (1st) listed for trading pursuant to Rule 8.51, they shall be listed with all Strike Prices of the next Regular Option Month with an expiration subsequent to the Serial Option.~~

~~(ii) Whenever the Strike Prices of the listed Options for any Regular or Serial Option Month do not include the first (1st) prescribed $.05 or $.10 level above the Settlement Price for the Underlying Futures Contract on the previous trading day, or either of the six (6) prescribed $.05 or $.10 levels above or below such a level, they shall be listed for trading on the following day, along with any unlisted prescribed $.05 or $.10 levels between such Settlement Price and the Settlement Price of the Underlying Futures Contract on the previous trading day plus any intervening $.025 prescribed levels below $1.00 will be inserted.~~]

[REMAINDER OF RULE UNCHANGED]

Rule 9.43. Strike Prices

* * *

(b) The Strike Prices of Options shall be at levels (the "prescribed levels") set at intervals (the "prescribed intervals") of fifty dollars ($50) [~~commencing at fifty dollars ($50) up to five thousand dollars ($5,000) per metric ton, and one hundred dollars ($100) at five thousand dollars ($5,000) per metric ton and above~~].

(c) Except as the Board or President may from time to time prescribe otherwise, Cocoa Options shall be listed for trading with particular Strike Prices for each Option Month as follows:

(i) At the time Cocoa Options for any Regular Option Month are first (1st) listed for trading pursuant to Rule 9.41, they shall be listed with thirteen (13) Strike Prices each for Puts and Calls at the prescribed fifty dollar ($50) [~~or one hundred dollar ($100) level. The first (1st) such Strike Price will be set at the prescribed fifty dollar ($50) or one hundred dollar ($100) level which is equal to the~~

EXHIBIT A

~~Settlement Price for the Underlying Futures Contract on the previous trading day, or if such Settlement Price is not equal to any such prescribed level, then at the next such prescribed fifty dollar ($50) or one hundred dollar ($100) level above such Settlement Price. The other twelve (12) Strike Prices shall be at each of the six (6) prescribed fifty dollar ($50) or one hundred dollar ($100) levels next above and the six (6) prescribed fifty dollar ($50) or one hundred dollar ($100) levels next below the first (1st) Strike Price. At the time Cocoa Options for any Serial Option Month are first (1st) listed for trading pursuant to Rule 9.41, they shall be listed with all the Strike Prices of the next Regular Option Month with an expiration subsequent to the Serial Option.~~

~~(ii) Whenever the Strike Prices of the listed Options for any Regular or Serial Option Month do not include the first (1st) prescribed fifty dollar ($50) or one hundred dollar ($100) level above the Settlement Price for the Underlying Futures Contract on the previous trading day, or either of the six (6) prescribed fifty dollar ($50) or one hundred dollar ($100) levels above or below such a level, they shall be listed for trading on the following day~~].

[REMAINDER OF RULE UNCHANGED]

Rule 11.24. Strike Prices

* * *

(b) The Strike Prices of Options that are listed for trading shall be at levels (the "prescribed levels") set in intervals (the "prescribed intervals") as follows:

(i) Strike Prices shall be at levels which are at intervals of one-quarter cent ($.0025) [~~commencing at $.0050 per pound up to $.1000; at levels which are at one-half cent ($.0050) commencing at $.1000 per pound up to $.2500 per pound; and at levels which are one cent ($.0100) at $.2500 per pound and above~~].

[REMAINDER OF RULE UNCHANGED]

27.19. Order Execution

(a) A Trade is executed in ETS when the following conditions occur:

(i) one order is a bid and the other is an offer;

(ii) the two orders are for the same Exchange Commodity Contract and delivery or expiration month and, if an option order, the same strike price and option type, if available; and

(iii) the price of the bid (offer) equals or is greater (less) than the price of the offer (bid).

* * *

(d) Each matched Trade shall be transmitted to TIPS/PTMS at which time executing Floor Brokers and Clearing Members will be able to view their matched Trades.

* * *

(iii) All mechanical adjustments shall be made through TIPS/PTMS. Any Registered Operator submitting a mechanical adjustment shall include all information required by TIPS/PTMS to process such mechanical adjustment.

[REMAINDER OF RULE UNCHANGED]

27.20. Trading Against Customer Orders

(a) During an ETS Trading Session, a Registered Operator shall not knowingly enter into, or cause to be entered into, a Transaction in which the Registered Operator takes the opposite side of a Customer order for the Registered Operator's own account, an account the Registered Operator either controls or has an interest in, an account of an Associated Broker, an account controlled by an Associated Broker or his employer's proprietary account unless the Customer Order has been entered immediately upon receipt and has first been exposed on ETS for a minimum of five (5) seconds with respect to futures orders, and for a minimum of fifteen (15) seconds with respect to Options orders, prior to the entry of the proprietary futures or Options order. Any Transaction that is consummated without the knowledge of the Registered Operator shall not be considered to have violated this Rule.

[REMAINDER OF RULE UNCHANGED]

27.21. Cross Trades

* * *

(b) Orders on opposite sides of the market for different beneficial accounts that are simultaneously placed by a Person with discretion over both accounts may be entered by the Registered User provided that, with respect to futures orders, one (1) order is exposed on ETS for a minimum of five (5) seconds and, with respect to Options orders, one (1) order is exposed on ETS for a minimum of fifteen (15) seconds, prior to the entry of the second futures or Options order.

(c) An order allowing for price and/or time discretion, if not entered immediately upon receipt, may be knowingly entered opposite a second order entered by the same entity only if the second order has been entered immediately upon receipt and, with respect to futures orders, has been exposed on ETS for a minimum of five (5) seconds, with respect to Options orders, one (1) order is exposed on ETS for a minimum of fifteen (15) seconds, prior to the entry of the second futures or Options order.

27.27. Settlement Prices

All Settlement Prices shall be determined in accordance with Floor Trading Rules 4.28 and 4.29.

27.28. Invalid Trades

Notwithstanding the Reasonability Limits, where applicable, a Trade made or purported to be made on ETS may be declared invalid by the Exchange in the following circumstances:

* * *

(c) Cancellation of a Trade

(i) An invalid Trade will be removed from TIPS/PTMS, may be removed from the trading server and may be displayed on ETS as a cancelled Trade.

(d) Notification

(i) When a Trade is declared invalid by the Exchange and is removed from TIPS/PTMS, the parties to the Trade will be notified by Market Supervision of that fact and a message will be broadcast on ETS announcing the Exchange Commodity Contract, delivery or expiration month and price level of the invalid Trade.

27.30. Errors and Omissions in Handling Orders

(a) If a Registered Operator who inadvertently, through error or omission, fails to execute an order in ETS at the time it should have been executed, and the order cannot be executed at a price which is better than or equal to that which the order should have received, the Registered Operator may, upon discovery of such error or omission, execute such order at the best obtainable price in either ETS or, if applicable, the open outcry market. Such order should be executed in the next available Exchange Trading Session for the applicable listed Exchange Commodity Contract, but, in any event, no later than the close of the next ETS Trading Session and shall be reported to the Customer at the price at which the order was actually executed.

[REMAINDER OF RULE UNCHANGED]

APPENDIX I

ERROR TRADE POLICY

* * *

2. Main Components of Policy

* * *

C. There is a defined no-cancellation range for each Contract. Trades executed within this price range will not, under normal circumstances, be cancelled. A component of market integrity is the assurance that once executed, except in exceptional circumstances, a trade will stand and not be subject to cancellation. Any trades that do not have an adverse effect on the market should not be able to be cancelled, even if executed in error.

The Exchange determines parameters above or below an Exchange set anchor price for each Contract within which a trade alleged as an error trade may not be cancelled. Such parameters are known as a 'no cancellation range'. The no cancellation range applicable to each product traded on the ETS is listed in the table in Section 4.

The anchor price is set by the Exchange and is based on the front contract month. The anchor price may be the previous night's settlement price, the opening call price or the last traded price. The anchor price of the second contract month and successive months onward is achieved by applying spread differentials against the front month anchor price.

If a trade takes place within the no cancellation range and is alleged as an error, the trade will not be cancelled.

D. Trades executed within the price reasonability limits but outside of the defined no-cancellation range may be reported to or considered by the Exchange as an error.

E. Market users have 5 minutes from the time of the original trade in which to allege a trade as having been executed in error.

F. Paragraphs C-E, as set forth above, do not apply to option contracts traded on ETS. The Exchange's review of an option trade to determine if the trade was executed at a premium that is representative of the option value will be based on a calculation that applies the appropriate option delta to the price of the underlying futures contract at the time of the option trade. This calculation will be performed by the Exchange and will use the option deltas published by the Exchange at the close of business on the prior Business Day. If the Exchange determines that an option trade was executed at a premium that is not representative of the market for that option at the time of its execution, the Exchange will cancel that option trade. The decision of the Exchange is final.

[~~F.~~]G. The Exchange Market Supervision Official will notify the market immediately . . . .

[~~G.~~]H. In order to assist the Exchange in determining whether the trade alleged as an error . . . .

[~~H.~~]I. Where consequential trades based on the price of the alleged error trade are executed after . . . .

[~~I.~~]J. The Exchange will make every attempt to ensure that a decision on whether an alleged error trade will stand or be cancelled will be communicated to the market as soon as reasonably possible after the time of the original trade. The Exchange will endeavor to complete this process 15 minutes after the time of the original trade.

[~~J.~~]K. The Exchange has the unilateral right to cancel any order and cancel any trade which . . . .

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4. NO CANCELLATION RANGE AND REASONABILITY LIMITS[1]

Contract	Reasonability Limit	No cancellation range
* * *	* * *	* * *
All Options Contracts	NA – See Section 2F above	NA – See Section 2F above

[REMAINDER OF ERROR POLICY UNCHANGED]

[1] Reasonability Limits and No Cancellation Ranges are subject to change.