



World Financial Center  
One North End Avenue  
New York, New York 10282

**BY ELECTRONIC TRANSMISSION**

Submission No. 13-44  
May 24, 2013

Ms. Melissa Jurgens  
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 Minimum Block Trade Size for Certain Currency Futures Contracts  
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6**

Dear Ms. Jurgens:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commission Regulation 40.6(a), ICE Futures U.S., Inc. (“Exchange”) submits the amendments to its Block Trading Procedures (the “Procedures”) (reflected in the Exchange’s Block Trade FAQ) set forth in Exhibit A. The amendments create standardized minimum block trade quantities for the Exchange’s regular and large-sized currency pair futures contracts, as discussed below.

**Regular-Sized Currency Pair Contracts**

The Exchange is amending the Procedures to reduce the block trade minimum quantity for 17 regular-sized currency pair futures contracts to 50 lots. In addition, the Exchange is also amending the Procedures to allow block trading for the following seven regular-sized currency pair futures contracts:

Code	Currency Pair	Minimum Block Size
PK	British Pound/Norwegian Krone	50 Lots
PS	British Pound/Swedish Krona	50 Lots
PZ	British Pound/South African Rand	50 Lots
KY	Norwegian Krone/ Japanese Yen	50 Lots
KJ	Swedish Krona/ Japanese Yen	50 Lots
KBX	Brazilian Real/ U.S. Dollar	50 Lots
KIU	Indian Rupee/ U.S. Dollar	50 Lots

The amendments will create a single standardized 50-lot block minimum quantity level for all of the Exchange’s regular-sized currency pair futures contracts. The Exchange believes that a single minimum block trade quantity for all currency pair contracts will simplify the process and be beneficial to trading participants. The Exchange further believes that the 50-lot level is appropriate for these 24 contracts based upon the current non-EFRP ADV. The regular-sized Euro / U.S. dollar futures has a non-EFRP ADV between 350-400 lots and all 23 of the other currency pair futures contracts have an ADV of less

than 40 lots. As such, the minimum block quantity will be set at a level that represents a significant percentage of Exchange's ADV.

### **Large-Sized Currency Pair Contracts**

The Exchange currently lists eleven currency pair futures contracts which have a contract size set at 1 million of the base currency. These million-sized contracts, which are based in the Australian dollar, British pound, Euro and U.S. dollar, are significantly larger than the corresponding regular-sized currency pair futures contracts listed by the Exchange. The notional value of these large contracts are 8 to 16 times greater than the notional value of the smaller contracts.<sup>1</sup>

The current minimum block trade quantities set by the Exchange for currency pair futures contracts are not based upon notional value and also vary from contract to contract. For example, the million-sized Euro / Japanese yen futures contract has a block trade minimum quantity of 100 lots while the regular-sized Euro / Japanese yen futures contract, which is much smaller, has a block trade minimum quantity of 50 lots. There is no consistent relationship between contract size and block minimum size. In addition, the current block minimum quantity for the large contracts vary, for some contracts the minimum quantity is 50 lots while for others the minimum is 100 lots.

Amendments to the Procedures reduce the minimum block quantity for all million-sized currency pair futures contracts to 5 lots. The 5-lot minimum quantity was selected to create a single level for all large-sized currency contracts that was in close proportion to the notional value of the regular-sized contract. The Exchange believes the 5-lot level is appropriate for these contracts as the current non-EFRP average daily volume ("ADV") for all is less than 25 lots. As such, the minimum block quantity will be set at a level that is a significant percentage of the Exchange's ADV for these contracts.

The amendments will become effective on Tuesday, June 11, 2013. The Exchange certifies that the amendments to the Procedures comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. The Exchange further certifies that, concurrent with this filing, a copy of this submission was posted on the Exchange's website and may be accessed at (<https://www.theice.com/notices/RegulatoryFilings.shtml>). No substantive opposing views were expressed by members or others with respect to the amendments.

If you have any questions or need further information, please contact the undersigned at 212-748-4021 or ([jason.fusco@theice.com](mailto:jason.fusco@theice.com)).

Sincerely,



Jason V. Fusco  
Assistant General Counsel  
Market Regulation

cc: Division of Market Oversight  
New York Regional Office

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<sup>1</sup> The notional value of the corresponding regular-sized currency contracts are 62,500 British pounds, 100,000 Australian dollars, 100,000 U.S. dollars and 125,000 Euros.

**EXHIBIT A**

**ICE FUTURES U.S.  
BLOCK TRADE – FAQs**

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**2. What are the eligible contracts and the minimum threshold quantities for a block trade?**

Table 1 below lists the eligible non-currency futures contracts and minimum quantity requirements for block trades. Table 2 below list the eligible currency future contracts and minimum quantity requirements for block trades. Table 3 below lists the minimum block quantity requirements for Energy futures and options contracts.

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**Table 2**

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Currency Futures Pair	Contract Symbol	Minimum Quantity Requirement
Millions FX British Pound / U.S. Dollar Futures	IMP	5[0] lots
Millions FX Euro / Canadian Dollar Futures	IEP	5[0] lots
Millions FX Euro / U.S. Dollar Futures	IEO	5[0] lots
Millions FX U.S. Dollar / Japanese Yen Futures	ISN	5[0] lots
Millions FX U.S. Dollar / Swiss Franc Futures	IMF	5[0] lots
Australian Dollar/Canadian Dollar Futures	AS	[40]50 lots
Pound Sterling/New Zealand Dollar Futures	GN	[40]50 lots
New Zealand Dollar/Japanese Yen Futures	ZJ	[40]50 lots
US Dollar/Hungarian Forint Futures	VU	[40]50 lots
US Dollar/Norwegian Krone Futures	NT	[40]50 lots
US Dollar/S.African Rand Futures	ZR	[40]50 lots
US Dollar/Swedish Krona Futures	KX	[40]50 lots
Euro/British Pound Futures	KGB	[40]50 lots
Euro/Hungarian Forint Futures	HR	[40]50 lots

<b>Euro/Norwegian Krone Futures</b>	<b>KOL</b>	<b>[<del>40</del>]50 lots</b>
<b>Euro/Swiss Franc Futures</b>	<b>KRZ</b>	<b>[<del>40</del>]50 lots</b>
<b>Millions FX Australian Dollar / U.S. Dollar Futures</b>	<b>IAU</b>	<b>[<del>400</del>]5 lots</b>
<b>Mexican Peso/US Dollar</b>	<b>KMP</b>	<b>[<del>40</del>]50 lots</b>
<b>Colombian Peso/US Dollar</b>	<b>KCU</b>	<b>[<del>40</del>]50 lots</b>
<b>Millions FX Euro / British Pound Futures</b>	<b>IGB</b>	<b>[<del>400</del>]5 lots</b>
<b>Millions FX Euro / Japanese Yen Futures</b>	<b>IEJ</b>	<b>[<del>400</del>]5 lots</b>
<b>Millions FX Euro / Swedish Krona Futures</b>	<b>IRK</b>	<b>[<del>400</del>]5 lots</b>
<b>Millions FX Euro / Swiss Franc Futures</b>	<b>IRZ</b>	<b>[<del>400</del>]5 lots</b>
<b>Millions FX U.S. Dollar / Canadian Dollar Futures</b>	<b>ISV</b>	<b>[<del>400</del>]5 lots</b>
<b>Millions FX U.S. Dollar / Swedish Krona Futures</b>	<b>IKX</b>	<b>[<del>400</del>]5 lots</b>
<b>Norwegian Krone/Swedish Krona Futures</b>	<b>NJ</b>	<b>[<del>4</del>]50 lots</b>
<b>US Dollar/Czech Koruna Futures</b>	<b>VC</b>	<b>[<del>4</del>]50 lots</b>
<b>Euro/Czech Koruna Futures</b>	<b>EZ</b>	<b>[<del>4</del>]50 lots</b>