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New York, New York 10282

BY ELECTRONIC TRANSMISSION

Submission No. 09-37
September 9, 2009

Mr. David 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 Rule 27.11(a)(iv) and Appendix I(4) of Chapter 27 - 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 Rule 27.11(a)(iv) and Appendix I(4) of Chapter 27, attached as Exhibit A.

Currently, the Sugar No. 11® futures contract has a No Cancellation Range ("NCR") of $.0010 for all contract or delivery months. The Sugar No. 11 futures contract has thirty-six (36) delivery months listed for trading. The range of prices traded in any one delivery month increases relative to the amount of time that must expire before the delivery month becomes the near or spot month, i.e. the further away from delivery the wider the price range. In order to account for the widening price ranges, the NCR for the Sugar No. 11 futures contract has been amended so that there is a different NCR for each specified group of delivery months. The first (1st) four (4) listed delivery months, except for January 2010 and January 2011, have the current NCR of $.0010; the second (2nd) four (4) listed delivery months, except for January 2010 and January 2011, have an NCR of $.0015; and all other delivery months, including January 2010 and January 2011, have an NCR of $.0020.

Rule 27.11(a)(iv) provides for two (2) different types of Stop Orders - Stop Limit Orders and Stop Orders with Protection. With respect to Stop Limit Orders, the Rule provides that the allowable price range between the stop price and limit price is restricted to 100% of the NCR for the specified Commodity Contract. With respect to Stop Orders With Protection, the Rule provides for Exchange set protection limits based on the NCR for the specified Commodity Contract. For those Commodity Contracts that have different NCRs for groups of listed delivery months, the Rule amendment specifies which NCR to use to determine the allowable price range for Stop Limit Orders and the Exchange set protection limit for Stop Orders With Protection.

The Rule amendment provides that the widest NCR that is listed for that Commodity Contract is to be applied. In the case of Sugar No. 11 futures contracts, which is the only Commodity Contract to date with various NCRs, the widest NCR is $.0020 and will be applied when determining the allowable range for Stop Limit Orders and the Exchange set protection limit for Stop Orders With Protection.

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 authorized by the President in accordance with Standing Resolution R-7 and will become effective on September 14, 2009. 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 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

EXHIBIT A

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

27.11. Acceptable Orders

(a) An ETS order shall be in one of the following order types (listed in alphabetical order):

* * *

(iv) "Stop orders" – Acceptable Types

(A) In the event that a particular Commodity Contract is subject to different NCRs based on the delivery months, the widest NCR that is listed for the particular Commodity Contract shall be applied for Stop Limit Orders and Stop Orders with Protection, regardless of the delivery month specified in such order.

(B) "Stop-Limit [~~o~~]Orders" – A Stop Limit [~~o~~]Order has two components: (1) the stop price and (2) the limit price. When a trade has occurred on ETS at or through the stop price, the order becomes executable and enters the market as a Limit order at the limit price. The order will be executed at all price levels from the stop price up to and including the limit price. If the order is not fully executed, the remaining quantity of the order will remain active in ETS at the limit price.

(a) The allowable price range between the stop price and the limit price of a Stop-Limit [~~o~~]Order will be restricted to 100% of the No Cancellation Range (NCR) for the specified Commodity Contract.

(b) A buy Stop-Limit becomes executable when a trade occurs at or higher than the stop price. When entered, the stop price must be above the current best offer or, if no working offer, above the current anchor price. The limit price must be equal to or greater than the stop price.

(c) A sell Stop-Limit becomes executable when a trade occurs at or lower than the stop price. When entered, the stop price must be below the current best bid or, if no working bid, then below the current anchor price. The limit price must be equal to or less than the stop price.

([~~B~~]C) "Stop [~~o~~]Orders with Protection" – A Stop Order with Protection has two components: (1) the stop price and (2) an Exchange set protection limit price. The Exchange set limit price is the NCR for the specified Commodity Contract from the stated stop price. When a trade has occurred on ETS at or through the stop price, the order becomes executable and enters the market as a Limit order at the Exchange set limit price. The order will be executed at all price levels from the stop price up to and including the limit price. If the order is not fully executed, the remaining quantity of the order will remain active in ETS at the limit price.

(a) A buy Stop will have as its Exchange set limit price the stated stop price plus the NCR for the specified Commodity Contract.

(b) A sell Stop will have as its Exchange set limit price the stated stop price minus the NCR for the specified Commodity Contract.

(c) For Commodity Contracts with daily price limits, the Exchange set limit price will not exceed the absolute maximum price permitted.

APPENDIX I

ERROR TRADE POLICY

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4. NO CANCELLATION RANGE AND REASONABILITY LIMITS[1]

Contract	Reasonability Limit	No Cancellation Range
	$ Value	$ Value
Cocoa Futures	$75.00	$15.00
Coffee "C"® Futures	$.0199	$.0060
Robusta Coffee Futures	$.0199	$.0060
Cotton No. 2 Futures	$.0100	$.0040
FCOJ Futures	$.0299	$.0150
Sugar No. 11 Futures	For all contract months: $.0050	For the first 4 listed contract months (other than January 2010 and 2011): $.0010 For the next 4 listed contract months (other than January 2010 and 2011): $.0015 January 2010 and January 2011: $.0020 For all other contract months: $0020

[REMAINDER OF CHART UNCHANGED]

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