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New York, New York 10282

C.F.T.C.
OFFICE OF THE SECRETARIAT

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BY ELECTRONIC TRANSMISSION

Submission No. 10-39
October 7, 2010

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 and Standing Resolution No. 5 - 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 and Standing Resolution No. 7, attached as Exhibit A.

Currently, only stop-limit orders and stop orders with protection ("Stop Orders") for outright futures contracts are available on ETS. The amendments to Rule 27.11 provide for Stop Orders for calendar spreads.

A stop-limit order on a calendar spread has two (2) components that are entered by the originator of the order: the stop price and the limit price. When a trade has occurred on ETS at or through the stop price, the order becomes executable and enters the market at the limit price; it can then be executed at all price levels from the stop price to the limit price. The allowable price range between the stop and limit prices on the order will be restricted to the "Calendar Spread Stop-Limit Order Range" ("CSLOR") determined for each commodity contract.

A stop order with protection order has two (2) components: the stop price (which is entered by the originator of the order) and an Exchange-set limit price. The limit price will be equal to the stop price plus (in the case of buy stop orders) or minus (in the case of sell stop orders) the CSLOR for the commodity contract.

The CSLOR for each product is determined by the Exchange. The proposed CSLORs that are to be used at implementation have been determined by Exchange staff based upon current market conditions. A chart showing the CSLOR for each product is attached as Exhibit B. The amendment to Standing Resolution R-7 gives the President the authority to make changes to the CSLOR as market conditions change.

The Exchange certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. No substantive opposing views were expressed by members or others with respect to the amendments.

The amendments were adopted by the Exchange's Board of Directors at its meeting on October 6, 2010. The amendments will go into effect on October 25th for the Russell Complex futures contract, on November 1st for the Currencies, the EURO Index and the USDX® futures contracts and on November 15th for the agricultural futures contracts.

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.)

Rule 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 Orders" – A Stop-Limit 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) With respect to Stop-Limit Orders for non-Calendar Spread transactions, t[~~T~~]he allowable price range between the stop price and the limit price of a Stop-Limit Order will be restricted to 100% of the No Cancellation Range (NCR) for the specified Commodity Contract.

(b) With respect to Stop-Limit Orders for Calendar Spreads, the allowable price range between the stop price differential and the limit price differential of a Stop-Limit Order will be restricted to the range specified for the Commodity Contract as determined by the Exchange from time to time (the "Calendar Spread Stop-Limit Order Range").

(c) 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~~]d) 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.

(C) "Stop 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.

(d) A buy Stop for a Calendar Spread will have as its Exchange set limit price differential the stated stop price differential plus the Calendar Spread Stop-Limit Order Range then in effect for the specified Commodity Contract.

(e) A sell Stop for a Calendar Spread will have as its Exchange set limit price differential the stated stop price differential minus the Calendar Spread Stop-Limit Order Range then in effect for the specified Commodity Contract.

[REMAINDER OF RULE UNCHANGED]

R-7 Delegation of Authority to President

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NOW, THEREFORE, BE IT RESOLVED, that the Board hereby delegates to the President the authority to:

* * *

4. solely with respect to Exchange or domestic holidays, change the settlement period for any Commodity Contract; [and]

5. change the No Cancellation Ranges for each futures and options contract listed electronically by the Exchange and set forth in Section 4 of Appendix I of Chapter 27; and

6. change the Calendar Spread Stop-Limit Order Range.

EXHIBIT B

Futures Contract (Symbol)	**Calendar Spread Stop-Limit Order Range**
Cocoa (CC)	10 points
Coffee "C"® (KC)	30 points
Cotton No. 2® (CT)	20 points
FCOJ (OJ)	75 points
Sugar No. 11® (SB)	10 points
Sugar No. 16 (SF)	25 points
CCI Index (CI)	125 points
RJ-CRB Index CR)	100 points
Russell Indexes (RF, TF, RG and RV)	200 points
U.S. Dollar Index (DX)	100 points
Euro Index (E)	150 points
Sterling-US dollar (MP and IMP)	25 points
Sterling-Norway(PK), Sterling-SA Rand(PZ),Sterling-Sweden(PS), Euro-Sweden(RK and IRK), Euro-Norway(OL), Euro-SA Rand(YZ), US$-SA Rand(ZR), Norway-Yen(KY) and Sweden-Yen(KJ)	750 points
All Other Currency Pair Contracts	150 points