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Submission No. 08-65  
November 17, 2008

Mr. David Stawick  
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: Block Trading Procedures -  
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, an amendment to its Block Trading Procedures.

The Exchange is amending its Block Trade Procedures to increase the minimum quantity threshold for Block Trades executed in Cocoa options contracts from 200 lots to 250 lots. The percentage share of Cocoa options trading executed as Blocks has steadily increased despite the recent threshold increase from 100 to 200 lots. By increasing the minimum quantity threshold, trading will be redirected to the main market and preserve the Block Trading facility for orders of significant size.

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

The amendment was adopted by the Exchange's Board of Directors on November 12, 2008 and will become effective December 1, 2008. 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](mailto:jill.fassler@theice.com).

Sincerely,

Jill S. Fassler  
Vice President  
Associate General Counsel

cc: Division of Market Oversight  
New York Regional Office