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

BY ELECTRONIC TRANSMISSION

Submission No. 09-52
November 19, 2009

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 Block Trade 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, amendments to the Exchange's Block Trades Procedures.

The Exchange has established a Block Trade minimum quantity threshold of 100 lots for transactions executed in the Sugar No. 11[®] futures contracts ("SB") as part of a SB/white refined arbitrage trade between SB and the LIFFE White Sugar futures contracts ("Refined"). The current minimum Block Trade quantity for outright trades in SB is 1000 contracts. Since the SB/white refined arbitrage market is a smaller subset of the larger sugar market, arbitrage between SB and Refined is difficult to execute as a Block Trade at the 1000 lot minimum quantity threshold. By setting the minimum quantity threshold at 100 lots, arbitrage between the two contracts will be facilitated and benefit market participants active in both markets. The Clearing Member(s) for each such arbitrage transaction will be responsible for ensuring that each SB Block Trade submitted as part of an arbitrage transaction is in fact part of a SB/Refined arbitrage transaction.

The amendments were adopted by the Exchange's Board of Directors at its meeting on November 11, 2009. The amendments to the Block Trade procedures will go into effect on November 23, 2009. The Exchange certifies that 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.

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

Sincerely,

Jill S. Fassler
Vice President
Associate General Counsel

cc: Division of Market Oversight
New York Regional Office