



Maria Alarcon
Staff Attorney

April 13, 2021

Re: Updates to ICC Rules Pursuant to Section 5c(c)(1) of the Commodity Exchange Act and Commission Regulation 40.6(a)

VIA ELECTRONIC PORTAL

Mr. Christopher Kirkpatrick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, D.C. 20581

Dear Mr. Kirkpatrick:

ICE Clear Credit LLC ("ICC") hereby submits, pursuant to Section 5c(c)(1) of the Commodity Exchange Act (the "Act") and Commodity Futures Trading Commission ("Commission") Regulation 40.6(a), a self-certification of changes to the ICC Clearing Rules (the "Rules") with respect to the description of ICE US Holding Company L.P. (the "Partnership"). ICC is registered with the Commission as a derivatives clearing organization ("DCO"). ICC intends to implement the changes no sooner than the tenth business day following the filing of this submission with the Commission at its Washington, D.C. headquarters and with its Chicago regional office.

ICC proposes to amend ICC Rule 503. This submission includes a description of the changes to the ICC Rules. Certification of the changes pursuant to Section 5c(c)(1) of the Act and Commission Regulation 40.6(a) is also provided below.

ICC proposes minor revisions to the Rules to update the description of the Partnership. ICC is wholly owned by the Partnership. Specifically, ICC proposes to amend ICC Rule 503(a)(iii) in connection with a change in the jurisdiction of legal organization of the Partnership from the Cayman Islands to Delaware (the "Domestication"). Under ICC Rule 503(a)(iii), the Partnership appoints three members of the ICC Risk Committee, consisting of an independent ICC Board member and two ICC officers. In referencing the Partnership, ICC Rule 503(a)(iii) describes the Partnership as a "Cayman Islands exempted limited partnership." In light of the Domestication, ICC proposes to describe the Partnership as a "Delaware limited partnership." Such amendment would not otherwise change the substance of ICC Rule 503(a)(iii) nor would it affect the rights, functions, or obligations of the Partnership in relation to ICC.

Core Principle Review:

ICC reviewed the DCO core principles ("Core Principles") as set forth in the Act. During this review, ICC identified the following Core Principles as being impacted:

Public Information: The changes to the Rules are consistent with the public information requirements of Core Principle L. ICC proposes minor revisions to update the description of the Partnership to a "Delaware limited partnership" given the Domestication to ensure that the Rules remain up-to-date and transparent. The Rules are publically available on ICC's website and enable market participants to identify and evaluate any risks and costs associated with using ICC's services.

Legal Risk: The changes to the Rules are consistent with the requirements of Core Principle R and Commission Regulation 39.27. The proposed amendment would not otherwise change the substance of ICC Rule 503(a)(iii) nor would it affect the rights, functions, or obligations of the Partnership in relation to



ICC. The Rules would continue to provide for a well-founded, transparent, and enforceable legal basis for ICC's activities

Amended Rules:

The proposed changes consist of changes to ICC Rule 503.

Annexed as an Exhibit hereto is the following:

- A. Proposed amendments to the ICC Rules

Certifications:

ICC hereby certifies that the changes comply with the Act and the regulations thereunder. There were no substantive opposing views to the changes.

ICC further certifies that, concurrent with this filing, a copy of the submission was posted on ICC's website, and may be accessed at: <https://www.theice.com/clear-credit/regulation>.

ICC would be pleased to respond to any questions the Commission or the staff may have regarding this submission. Please direct any questions or requests for information to the attention of the undersigned at (312) 836-6854.

Sincerely,

A handwritten signature in black ink that reads 'Maria Alarcon' in a cursive script.

Maria Alarcon
Staff Attorney