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BY ELECTRONIC TRANSMISSION

Submission No. 15-121

July 8, 2015

Mr. Christopher Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: ICE Clear US, Inc. Self-Certification Pursuant to Commission Rule 40.6(a) - Amendment to By-law 5.6 re: Super Margin and Position Limit Calculations

Dear Mr. Kirkpatrick:

ICE Clear US, Inc. ("ICE Clear US" or the "Clearing House"), a registered derivatives clearing organization ("DCO") under the Commodity Exchange Act, as amended (the "Act"), hereby submits to the Commodity Futures Trading Commission (the "Commission"), for self-certification pursuant to Commission Rule 40.6, the amendment to its By-Laws attached hereto (Exhibit A) and discussed herein. These amendments are further described in the attached notice to clearing members (Exhibit B). The amendment is to become effective on the first business day following the tenth business day after submission, or such later date as ICE Clear US may designate.

Explanation and Analysis

ICE Clear US proposes to amend By-Law 5.6 by removing the Supermargin calculation and replacing it with a "Stress Loss Charge" as further described below and in the attached Exhibit B. In addition, ICE Clear US is amending By-Law 5.6 in order to simplify and clarify the Clearing House's ability to establish, amend or revoke limits on "position risk" for Clearing Members or in respect of particular accounts. The definition of "position risk" is not changing and continues to mean, with respect to any Clearing Member, the amount of original margin required from such Clearing Member, exclusive of Option liquidating value, as calculated by the Corporation.

Currently, Supermargin is 50% of the amount a clearing member's net margin exceeds 75%, 150% or 200% of the clearing member's assigned capital. The 75% threshold is for the clearing firm's house margin, the 150% threshold applies to customer margin and the 200% threshold applies to the combined customer and house net margin. Supermargin is calculated on a daily basis and added to the clearing member's house initial margin requirements.

In addition, currently Clearing Members that have a significant exposure to the Guaranty Fund after Supermargin is applied, also have an add-on initial margin requirement. The combined Supermargin and add-on margin reduces a Clearing Member's exposure to the guaranty fund.

The proposed rule change will replace these two additions to a Clearing Member's initial margin requirements with a Stress Loss Charge. The Stress Loss Charge will have two components as follows:

- The combined exposure of two clearing members to the ICUS target guaranty fund size, and
- Each individual clearing member's exposure to the target guaranty fund size

The Stress Loss Charge, like the Supermargin plus add-on charge it is replacing, has the effect of reducing the applicable Clearing Member's exposure to the Guaranty Fund.

Compliance with the Act and Commission Regulations

The amendments are consistent with the DCO Core Principles as set forth in the Act. In particular, the amendments are consistent with the risk management requirements of Core Principle D (including CFTC Regulation 39.13 and CFTC Regulation 39.36). For example, the amendments are consistent with CFTC Regulation 39.13(f), as ICE Clear US continues to limit exposure to potential losses from defaults by applying margin requirements (formerly known as Supermargin and know known as the Stress Loss Charge) and utilizing other risk control mechanisms such as limits on position risk.

ICE Clear US hereby certifies that the amendment complies with the Act and the Commission's regulations thereunder.

ICE Clear US has received no substantive opposing views in relation to the proposed rule amendment.

ICE Clear US has posted a notice of pending certification and a copy of this submission on its website concurrently with the filing of this submission.

If you or your staff should have any questions or comments or require further information regarding this submission, please do not hesitate to contact the undersigned at Heidi.Rauh@theice.com or (312) 836-6716.

Sincerely,

Heidi M. Rauh

Heidi M. Rauh
General Counsel

Attachments

Cc: Thomas Hammond
Bruce Domash