

November 1, 2016

Submitted via CFTC Portal

Division of Market Oversight
U.S. Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: ICAP Global Derivatives Limited – Regulation 40.6 Rule Certification – Amended Rulebook

Ladies and Gentlemen:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the “Act”) and Section 40.6(a) of the regulations of the Commodity Futures Trading Commission (the “Commission”), ICAP Global Derivatives Limited (“IGDL” or the “Facility”) hereby notifies the Commission that it has amended its Rulebook, specifically Rule 308(f). The Rulebook has been amended to reflect Commission No-Action Letter (“NAL”) 16-74.

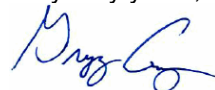
A concise explanation and analysis of the amendments to the Rulebook and their compliance with applicable provisions of the Act and the Commission’s regulations thereunder is attached hereto as Exhibit A. A clean copy of the amended Rulebook exclusive of confidential Chapter 9 is attached hereto as Exhibit B and a copy of the Rulebook exclusive of confidential Chapter 9 marked to show changes against the version submitted to the Commission in IGDL-2016-R-13 is attached hereto as Exhibit C.

The amendments will become effective on November 16, 2016. IGDL certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. IGDL has reviewed the swap execution facility core principles (“Core Principles”) as set forth in the Commodity Exchange Act and has determined that the amendments impact the Core Principles identified in Exhibit A.

IGDL is not aware of any substantive opposing views expressed with respect to this filing and certifies that, concurrent with this filing, a copy of this submission was posted on the IGDL website and may be accessed at: <http://www.icap.com/what-we-do/global-broking/sef.aspx>.

Please contact the undersigned at (212) 341-9193 with any questions regarding this matter.

Very truly yours,



Gregory Compa
Chief Compliance Officer

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Exhibit A*Explanation and Analysis*

1. On October 7, 2016 the Commission published NAL 16-74, which extended the relief previously provided in NAL 15-60 to the earlier of November 15, 2017 or the effective date of any permanent Commission action related to the relief granted in NAL 16-74. References in Rule 308(f) to NAL 15-60 have been changed to NAL 16-74. IGDL has also amended the Regulatory Status notices at the end of the definitions section to reflect that IGDL is registered as a SEF with the Commission.

The amendments are consistent with Core Principle 2 and NAL 16-74.