



BY ELECTRONIC MAIL

Submission No. 17-124
August 14, 2017

Mr. Christopher J. Kirkpatrick
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 Disruptive Trading Practices FAQ
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6(a)**

Dear Mr. Kirkpatrick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended, and Commission Regulation 40.6(a), ICE Futures U.S., Inc. ("Exchange") self certifies the amendment to the Exchange's Disruptive Trading Practices FAQ, as set forth in Exhibit A. The amendment addresses the entry of improper orders to transact against a User Defined Strategy ("UDS"). The amendment to Question 16 specifically advises participants that the submission of an order to transact against a covered option strategy, which is intentionally structured to result in an inequitable allocation of futures contracts, may be considered a violation of the Rules.

The Exchange certifies that the amendment to the FAQ, which will become effective on August 29, 2017, complies with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder. The Exchange has reviewed the designated contract market core principles ("Core Principles") as set forth in the Act and has determined that the FAQ complies with the Core Principles 2 (Compliance with Rules), Core Principle 7 (Availability of Information) and is made in furtherance of Core Principle 9 (Execution of Transactions) and 12 (Protection of Markets and Market Participants). The FAQ provides guidance on prohibited transaction which may harm participants and disrupt the marketplace.

The Exchange further certifies that, concurrent with this filing, a copy of this submission was posted on the Exchange's website and may be accessed at (<https://www.theice.com/notices/RegulatoryFilings.shtml>). 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 the undersigned at 212-748-4021 or (jason.fusco@theice.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Jason V. Fusco". The signature is written in a cursive style with a large, sweeping initial "J".

cc: Division of Market Oversight
New York Regional Office

Jason V. Fusco
Assistant General Counsel
Market Regulation

EXHIBIT A



DISRUPTIVE TRADING PRACTICES

FAQs

[January 2015] August 2017

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Q16: Is the creation or execution of User Defined Strategies (“UDS”) for the purposes of deceiving or disadvantaging other market participants a violation of the Rules?

A16: Yes. UDS functionality requires users to exercise diligence and care in the creation of option spread instruments, including the creation of covered option strategies. Market participants are reminded that knowingly creating and/or trading UDS instruments in a manner intended to deceive or unfairly disadvantage other market participants, including the submission of an order to transact against a covered option strategy, which is intentionally structured to result in an inequitable allocation of futures contracts, may be considered a violation of the Rules. Additionally, Market Supervision may price adjust or cancel trades that are deemed to negatively impact the integrity of the market pursuant to the provisions of the Exchange’s Error Trade Policy.

[REMAINDER OF FAQ UNCHANGED]