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BY ELECTRONIC TRANSMISSION

Submission No. 09-16
April 2, 2009

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

**Re: Block Trading 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 its Block Trading Procedures.

The Exchange is amending its Block Trade Procedures for Coffee "C"[®] futures contracts ("KC") as follows:

(1) allow outright Block Trades in all delivery months but not in the spot month after the fifth (5th) business day prior to the first notice day¹, *i.e.* twelve (12) business days prior to the first (1st) business day of the spot month; currently outright Block Trades may only be transacted in delivery months which are more than twelve (12) months out;

(2) set the minimum volume thresholds for:

- (a) delivery months within the first twelve calendar months – 500 lots
- (b) delivery months more than twelve calendar months out – 250 lots (changed from 500 lots)
- (c) spread trades in which one or both of the delivery months fall within the first twelve (12) calendar months – 500 lots

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¹ The first notice day for KC is seven (7) business days prior to the first (1st) business day of the delivery or spot month.

(d) spread trades in which both of the delivery months are more than twelve (12) calendar months out – 250 lots.

The statistics, attached as Exhibit A, show that for the period of February and March 2009 90% of the trades executed in KC were 5 lots or less which is well under the 250 and 500 lot minimum volume threshold.

The Exchange certifies that the amendments comply with the requirements of the Commodity Exchange Act and the rules and regulations promulgated thereunder.

The amendments were adopted by the Exchange's Board of Directors on March 18, 2009 and will become effective on April 6, 2009. 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 jill.fassler@theice.com.

Sincerely,

Jill S. Fassler
Vice President
Associate General Counsel

cc: Division of Market Oversight
New York Regional Office

Trade Size - Number of Lots by Percentile

Execution Date Range: 2/1/2009 to 3/31/2009

	30th Percentile	60th Percentile	90th Percentile
CC Futures	1	1	5
CT Futures	1	1	5
KC Futures	1	1	5
OJ Futures	1	1	5
SB Futures	1	3	10