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World Financial Center
One North End Avenue
New York, New York 10282

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Submission No. 08-45
July 18, 2008

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: Amendments to Rules 6.17, 6.18 and 6.22 -
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 Rules 6.17, 6.18 and 6.22, attached as Exhibit A.

The amendments add the reference to Rule 6.13 which was amended, and approved by the Commission on January 2, 2008, to add enforcement powers for position accountability levels (See Submission No. 07-68).

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 June 11, 2008. No substantive opposing views were expressed by members or others with respect to the amendments. The amendments will become effective on July 28, 2008.

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

(In the text of the amendments below, additions are underlined and deletions are bracketed and lined out.)

Rule 6.17. Position Limits and Position Accountability for Cocoa Contracts

Rule 6.18. Position Limits and Position Accountability for Coffee “C” Contracts

Rule 6.22. Position Limits and Position Accountability for Sugar No. 11 Contracts

(a)(ii) shall provide, in a timely manner, information on the nature of that Person’s related cash, Exchange Futures and Options Contracts positions, trading strategy and/or hedging strategy. Nothing in this Rule limits the authority of the Exchange to take action under Rules 6.11, [~~and~~] 6.12 and 6.13 or to request and collect any information regarding that Person’s related cash and Exchange Futures and Options Contracts positions.

[REMAINDER OF RULES UNCHANGED]

EXHIBIT A