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New York, New York 10282

BY ELECTRONIC TRANSMISSION

Submission No. 08-69
December 12, 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

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**Re: Amendments to Rule 6.25 -
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 Rule 6.25, attached as Exhibit A.

When determining position limits for the Russell 1000 and Russell 2000 Index contracts, the full size and the mini contracts are added together. After the December 2008 expiration, the full size Russell 1000 and Russell 2000 Index contracts will no longer be listed for trading at the Exchange. Therefore, Rule 6.25 was amended to delete the references to the full size Russell 1000 and Russell 2000 Index contracts.

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 December 10, 2008. No substantive opposing views were expressed by members or others with respect to the amendments and will become effective on December 22, 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

EXHIBIT A

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

Rule 6.25. Position Limits for Index Contracts

* * *

(c) Russell 1000[®] [~~Index and Russell 1000~~] Mini Index

(i) Subject to the exceptions contained in this Chapter, the maximum number of Exchange Futures Contracts and Futures Equivalent Contracts, net long or net short, which any one (1) Person may own or control in the Russell 1000 [~~Index and Russell 1000~~] Mini Index Contract[s] is fifty thousand (50,000) in all months combined or in any one (1) month.

~~[(ii) In computing net positions for the purposes of this Rule, five (5) times the net position in the Russell 1000 Index Futures shall be combined with positions in the Russell 1000 Mini Index Futures Contract.]~~

* * *

(f) Russell 2000[®] [~~Index and Russell 2000~~] Mini Index

(i) Subject to the exceptions contained in this Chapter, the maximum number of Exchange Futures Contracts and Futures Equivalent Contracts, net long or net short, which any one (1) Person may own or control in the Russell 2000 [~~Index and Russell 2000~~] Mini Index Contract[s] is fifty thousand (50,000) in all months combined or in any one (1) month.

~~[(ii) In computing net positions for the purposes of this Rule, five (5) times the net position in the Russell 2000 Index Futures shall be combined with positions in the Russell 2000 Mini Index Futures Contract.]~~

[REMAINDER OF RULE UNCHANGED]