

Eric Nield
General Counsel

March 12, 2014

Ms. Melissa Jurgens
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

**Re: ICE Clear Credit LLC Advance Notice of Proposed Rule Change Pursuant to
Commission Rule 40.10**

Dear Ms. Jurgens:

ICE Clear Credit LLC (“ICC”), a registered derivatives clearing organization (“DCO”) under the Commodity Exchange Act, as amended (the “Act”) that has been designated by the Financial Stability Oversight Council as systemically important under Title VIII of the Dodd-Frank Wall Street Reform and Consumer Protection Act, hereby submits to the Commodity Futures Trading Commission (the “Commission”), pursuant to Commission Rule 40.10, the attached amendments to its clearing rules (the “Amended Rules”). ICE Clear Credit intends to implement these rule amendments upon completion of the review period under Rule 40.10. ICC notes that the proposed rule change would materially decrease risk and hereby requests, pursuant to Commission Rule 40.10(a)(3), that the Commission expedite its review of the Amended Rules.

As set forth in more detail below, the proposed revisions are intended to update ICC’s liquidity thresholds for Euro denominated products. ICC will require the first 65% of Clearing Participant Non-Client Initial Margin and Guaranty Fund Liquidity Requirements (“Non-Client Liquidity Requirements”) to be satisfied with collateral in the currency of the underlying instrument. Accordingly, ICC proposes updating the liquidity thresholds for Euro denominated products, listed in Schedule 401 of the ICC Rules, to require the first 65% of Non-Client Liquidity Requirements for Euro denominated products to be satisfied with Euro cash.

For United States Dollar (“USD”) denominated products, the first 65% of Non-Client Liquidity Requirements must be satisfied with USD denominated collateral. Specifically, the first 45% of Non-Client Liquidity Requirements must be posted in USD cash and the next 20% may be posted in USD denominated assets (USD cash and/or US Treasury securities). Currently, for Euro denominated products, 45% of Non-Client Liquidity Requirements must be posted in Euro cash and the next 20% may be posted in Euro cash, USD cash, and/or US Treasury securities.

ICC proposes to require the first 65% of Non-Client Liquidity Requirements for both USD and Euro denominated products to be satisfied with collateral in the currency of the underlying instrument. Accordingly, ICC is updating its liquidity thresholds for Euro denominated products so that the first 65% of Non-Client Liquidity Requirements for Euro denominated products must be satisfied with Euro cash. This change will increase the Euro cash Non-Client Liquidity Requirements for Euro denominated products and create more consistent liquidity requirements across USD and Euro denominated products.

In updating the Non-Client Liquidity Requirements for Euro denominated products, ICC ensures that the first 65% of collateral posted by Clearing Participants is in the currency of the underlying instrument. ICC has always operated under this requirement for USD denominated products and now will achieve consistency across Euro and USD instruments. This change reduces ICC's liquidity risk by requiring a greater percentage of the Non-Client Liquidity Requirements for Euro denominated products to be met with Euro cash. Overall, the Amended Rules materially decrease risk across the clearing house and thus, ICC respectfully requests that the Commission expedite its review of the Amended Rules pursuant to Commission Rule 40.10(a)(3).

Additionally, redundant references to "US cash" in Schedule 401 of the ICC Rules have been removed, as US cash is included in all "G7 cash" references.

The ICC Treasury Operations Policies and Procedures have been updated to reflect the update to ICC's Non-Client Liquidity Requirements for Euro denominated products. The changes to the Euro cash Non-Client Liquidity Requirements do not require any operational changes.

Core Principle Review:

ICC reviewed the DCO core principles ("Core Principles") as set forth in the Act. During this review, ICC identified the following Core Principles as being impacted:

Financial Resources: The update to ICC's liquidity thresholds for Euro denominated products is consistent with the financial resources requirements of Principle B.

Risk Management: The update to ICC's liquidity thresholds for Euro denominated products is consistent with the risk management requirements of Principle D.

ICC has received no substantive opposing views in relation to the proposed rule amendments.

Certification of the Amended Rules pursuant to Section 5c(c)(1) of the Act and Commission Regulation 40.10 is also provided below.

Annexed as an Exhibit hereto is the following:

- A. Amendments to Schedule 401 of the ICC Rules

Certifications:

ICC hereby certifies that the Amended Rules comply with the Act and the regulations thereunder. The Amended Rules were unanimously recommended for approval by the ICC Risk Committee and unanimously approved by the ICC Board of Managers.

ICC hereby certifies that, concurrent with this filing, a copy of the submission was posted on ICC's website, which may be accessed at:

<https://www.theice.com/notices/Notices.shtml?regulatoryFilings>.

ICC would be pleased to respond to any questions the Commission or the staff may have regarding this submission. Please direct any questions or requests for information to the attention of the undersigned at (312) 836-6742.

Sincerely,



Eric Nield
General Counsel

cc: Board of Governors of the Federal Reserve System (by email)
Stuart E. Sperry, Board of Governors (by email)
Jeff Stehm, Board of Governors (by email)
Brian O'Keefe, CFTC (by email)
Sarah Josephson, CFTC (by email)
John C. Lawton, CFTC (by email)
Phyllis Dietz, CFTC (by email)
Steve Greska, CFTC (by email)
Julie Mohr, CFTC (by email)
Kate Meyer, CFTC (by email)
Tad Polley, CFTC (by email)
Michelle Weiler, ICC (by email)
Sarah Williams, ICC (by email)



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Schedule 401: Eligible Collateral & Thresholds

Non-Client Initial Margin and Guaranty Fund Liquidity Requirements

Non-Client US Dollar Denominated Product Requirements

Asset Type	Minimum Percentage of Requirement*
US Dollar Cash	45%
US Dollar Denominated Assets (US Cash and/or US Treasuries)	+ 20% (for a total 65%)
All Eligible Collateral (US Cash , US Treasuries and/or G7 cash)	+ 35% (for a total of 100%)

* Subject to GF minimum requirement of \$20 MM being 100% in US Cash

Non-Client Euro Denominated Product Requirements

Asset Type	Minimum Percentage of Requirement*
Euro Cash	65%
Euro Cash, US Dollar Cash and/or US Treasuries	+ 20% (for a total 65%)
All Eligible Collateral (US Cash , US Treasuries and/or G7 cash)	+ 35% (for a total of 100%)

* Subject to GF minimum requirement of \$20 MM being 100% in US Cash

Client-Related Initial Margin Liquidity Requirements

Client-Related US Dollar Denominated Product Requirements

Asset Type	Minimum Percentage of Requirement
US Dollar Denominated Assets (US Cash and/or US Treasuries)	65%
All Eligible Collateral (US Cash , US Treasuries and/or G7 cash)	+ 35% (for a total of 100%)

Client-Related Euro Denominated Product Requirements

Asset Type	Minimum Percentage of Requirement
Euro and/or US Dollar Denominated Assets (US Cash, Euro Cash, and/or US Treasuries)	65%
All Eligible Collateral (US Cash , US Treasuries and/or G7 cash)	+ 35% (for a total of 100%)