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July 29, 2016

Christopher J. Kirkpatrick
Secretary
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW.
Washington, DC 20581

Re: ICE Futures U.S., Inc. Submission No. 16-67 – Proposed Amendments to Block Trade FAQ

Dear Mr. Kirkpatrick:

The FIA Principal Traders Group¹ (“FIA PTG”) appreciates the opportunity to comment in support of the ICE Futures U.S., Inc. (“IFUS”) Submission No. 16-67 to amend the Exchange’s Block Trade Frequently Asked Questions. FIA PTG appreciates the efforts of IFUS to clarify and bring additional guidance to the question of what is acceptable pre-hedging or anticipatory hedging activity in connection with what parties believe in good faith will result from the negotiation of a block trade. Accordingly, we encourage the Commodity Futures Trading Commission to approve the proposed amendment.

If you have any questions or need any additional information please do not hesitate to contact Joanna Mallers (jmallers@fia.org).

Respectfully,

A handwritten signature in blue ink that reads 'Joanna Mallers'. The signature is written in a cursive, flowing style.

Joanna Mallers
FIA Principal Traders Group, Secretary

cc: Division of Market Oversight
Vince A. McGonagle, Director
David Van Wagner, Chief Counsel
Steven Sherrod, Senior Economist
ICE Futures U.S.
Trabue Bland, President
Conor Weber, Compliance Counsel
Erik Haas, Director – Market Regulation
Kara Dutta, Assistant General Counsel

¹ FIA PTG is an association of more than 20 firms that trade their own capital on exchanges in futures, options and equities markets worldwide. FIA PTG members engage in manual, automated and hybrid methods of trading, and they are active in a wide variety of asset classes, including equities, fixed income, foreign exchange and commodities. FIA PTG member firms serve as a critical source of liquidity, allowing those who use the markets, including individual investors, to manage their risks and invest effectively.