

Submission No. 26-006A

February 4, 2026

Mr. Christopher J. Kirkpatrick
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 ICE Futures U.S. Rulebook and FAQs
Submission Pursuant to Section 5c(c)(1) of the Act and Regulation 40.6**

Dear Mr. Kirkpatrick:

Pursuant to Commission Regulation 40.6, ICE Futures U.S., Inc. (“Exchange” or “IFUS”) filed Submission No. 26-006, by written certification, amendments to Exchange Rules 4.17 and 4.37, amendments to the Block Trade FAQ, EFRP FAQ, and Trade at Settlement FAQ, as well as, new Exchange Rule 32.6 and new Guidance on Tradeable Crypto Markers document. The new rules and amendments provided various updates and supplemental guidance and answers to frequently asked questions related to Exchange rules associated with the listing of the Exchange’s new cash-settled futures contracts based on CoinDesk Benchmark Rates and Indices.

The Exchange hereby submits this filing to modify Submission No. 26-006 to provide non-substantive amendments to the new Tradeable Crypto Markers document and to provide a listing date for certain of the Tradeable Crypto Markers within Exhibit A.

Certifications

The amendments provide supplementary information, guidance and answers to frequently asked questions related to Exchange Rules associated with the listing of the CoinDesk contracts and will become effective on such date as the Exchange shall determine, which shall be no sooner than the tenth business day following the business day on which such submission was received by the Commission. The Exchange has reviewed the designated contract market core principles (“Core Principles”) as set forth in the Act and has determined that the new rules and amendments comply with the following relevant Core Principles:

COMPLIANCE WITH RULES (Principle 2): The new and amended Exchange Rules and FAQs provide guidance to market participants on the requirements related to trading in the Exchange’s CoinDesk Futures contracts. The amendments are intended to assist market participants in avoiding rule violations and clarifying the applicability of various rules within the Exchange’s rulebook. It is the Exchange’s belief that the amendments will provide additional clarity and certainty to market participants regarding the Exchange’s CoinDesk Futures contracts.

POSITION LIMITS OF ACCOUNTABILITY (Principle 5): Positions in the new CoinDesk contracts will be subject to the single and all-month accountability levels and spot position limits set by the Exchange.

AVAILABILITY OF GENERAL INFORMATION/ DAILY PUBLICATION OF TRADING INFORMATION (Principles 7 and 8): The Exchange is publicly posting the new and amended Exchange Rules and FAQs to ensure that market participants have updated guidance and

information related to the Exchange's new CoinDesk Futures contracts. The amended Rulebook and FAQs will be available on the ICE Futures U.S. website.

DAILY PUBLICATION OF TRADING INFORMATION (Principle 8): The Exchange will publish on its website and distribute through quote vendors trading volume, open interest levels, and daily price information for CoinDesk futures contracts as it does for other Exchange futures contracts.

EXECUTION OF TRANSACTIONS (Principle 9): The new contracts will be listed on the Exchange's electronic trading platform which provides a competitive, centralized market for transparent execution of transactions. In addition, the Exchange may permit certain noncompetitive transactions pursuant to existing Exchange Rules.

RECORDKEEPING AND TRADE INFORMATION (Principle 10): The Exchange has rules and procedures in place to provide for the recording and storage of the requisite trade information sufficient for the Market Regulation Department to detect and prosecute customer and market abuses.

The Exchange is not aware of any opposing views expressed regarding the amendments to the Exchange Rulebook and FAQs and the adoption of related rules, and certifies that concurrent with this filing a copy of this submission was posted on the Exchange's website, which may be accessed at: (<https://www.theice.com/futures-us/regulation#rule-filings>).

Sincerely,

A handwritten signature in dark ink, appearing to read "Patrick Swartz", is positioned above the printed name.

Patrick Swartz
Director
ICE Futures U.S.

EXHIBIT A



TRADEABLE CRYPTO MARKERS

February 2026

CRYPTO MARKERS

ICE Futures U. S. is introducing Tradeable Crypto Markers [~~hereinafter “Crypto Markers”~~](also known as Basis Trade at Index Close, or “BTIC” trades) as a way of enabling customers to manage their price risk more effectively during the trading day. By referencing an official marker price as set out by the Exchange, traders are able to manage their price risk more effectively by aligning traded futures and related crypto product prices at the same point in the day. This can often help in reducing basis risk.

CRYPTO MARKERS

~~[The following f]~~Four Crypto Markers are ~~[offered]~~used in connection with the four Tradeable Markers for IFUS Crypto [ICE Futures U.S. CoinDesk] futures contracts:

- ~~1. **BTIC 4PM LONDON Marker** – the value is the relevant CoinDesk Settlement Rate, which is set using prices during a 60-minute period ending at 4:00 pm London time.~~
- ~~2. **BTIC 4PM ET VWAP Marker** – the value is the relevant CoinDesk Settlement Rate, which is set using prices during a 60-minute period ending at 4:00 pm ET.~~
- ~~3. **BTIC 4PM ET Spot Marker** – the value is the relevant CoinDesk Spot Rate at 4:00 pm ET.~~
- ~~4. **BTIC 8AM UTC Marker** – the value is calculated as a Time Weighted Average Price (TWAP), which is set using the relevant CoinDesk Spot Rate during the 30-minute period ending at 8:00 am UTC.]~~

For any Crypto futures contract, the **BTIC 4PM LONDON Marker** value is the relevant CoinDesk Settlement Rate, using prices during a 60-minute period ending at 4:00 pm London time.

For any Crypto futures contract, the **BTIC 4PM ET VWAP Marker** value is the relevant CoinDesk Settlement Rate, using prices during a 60-minute period ending at 4:00 pm ET.

For any Crypto futures contract, the **BTIC 4PM ET Spot Marker** value is the relevant CoinDesk Spot Rate at 4:00 pm ET.

For any Crypto futures contract, the **BTIC 8AM UTC Marker** value is calculated as a Time Weighted Average Price using the relevant CoinDesk Spot Rate during the 30-minute period ending at 8:00 am UTC.

Crypto Marker Values are calculated by CoinDesk Indices.

TRADEABLE CRYPTO MARKERS

~~[Crypto Markers enable market participants to agree to trade a particular CoinDesk futures contract month at a basis differential to one of the above specified markers. The clearing price of a Crypto Marker will be the respective marker value plus the agreed basis differential (which can be a negative number).]~~ Tradeable Crypto Markers enable market participants to agree to trade a particular Crypto futures contract month at a Basis differential to a specified Crypto Marker. The clearing price of a Tradeable Crypto Marker trade will be the respective Crypto Marker value plus the agreed Basis differential (which can be a negative number).

Four different Tradeable Crypto Markers are available (although not all Tradeable Crypto Markers are available for all ~~[CoinDesk]~~Crypto futures contracts). The availability of each marker for each CoinDesk futures contract is set forth below¹.

	TRADEABLE MARKERS			
Marker Name	BTIC 4PM LONDON	BTIC 4PM ET VWAP	BTIC 4PM ET SPOT	BTIC 8 AM UTC
Marker Symbol	<u>_MM1</u>	<u>_P</u>	<u>_ME1</u>	<u>_MD1</u>
FUTURES CONTRACT	CLOB TRADEABLE MARKER AVAILABLE			
CoinDesk 20 Index (CD20)	YES	YES	No	No
CoinDesk 5 Index (CD5)	YES	YES	YES	No
CoinDesk Bitcoin (CDB)	YES	YES	No	YES
CoinDesk Ether (CDE)	YES	YES	No	YES
CoinDesk Solana (CDS)	YES	YES	No	No
CoinDesk XRB (CDX)	YES	YES	No	No
CoinDesk BNB (BNB)	YES	YES	No	No
CLOB LISTED CONTRACT MONTHS ELIGIBLE	Front 2	Front 2	Front 2	Front 2
CLOB Bid/Offer min/max price range limit	None	None	None	None

¹ The CoinDesk futures contracts will be listed for trading on February 9, 2026. The 4PM London and 4pm NY VWAP Markers will be available on that date for the futures contracts indicated above; the 4PM NY Spot and 8am UTC Markers will be made available for the futures contracts shown above trading at a later date.

~~[Screen trading is available for each Crypto Marker, from the market open of the relevant CoinDesk futures contract each day through the end of the calculation period for such marker. Crypto Markers will be offered for the first two listed futures contract months of each enabled CoinDesk futures contract.]~~ For each Tradeable Marker, screen trading of the Marker is available from the start of the trading day of the relevant Crypto futures contract through the end of the calculation period for the Marker. Tradeable Marker capability will be offered for each of the first two listed futures contract months of each Crypto futures contract for which a Tradeable Marker is available.

Also, for each Crypto Marker, central limit order book (CLOB) bids and offers must follow the minimum tick convention of the respective CoinDesk futures contract, but the basis differential is not restricted to any minimum number of ticks above and below the respective Crypto Marker value.

Block Trading of each Crypto Marker is also supported. Information on Block Trades at ICE Futures U.S., Inc. can be found [here](#).