



3/1/2016

Christopher Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
1155 21st Street, NW
Washington, DC 20581

Re: Extension to file comments to Notice of Proposed Rulemaking on Regulation Automated Trading

Dear Mr. Kirkpatrick,

CME Group, Inc. ("CME") and Intercontinental Exchange, Inc. ("ICE") respectfully request a thirty (30) day extension to the comment period for the Notice of Proposed Rulemaking on Regulation Automated Trading ("Regulation AT").

Regulation AT is both important and comprehensive. It merits fulsome and meaningful public comments on the many questions the proposal has raised. ICE and CME are working independently and in coordination to offer up constructive alternative solutions to many of the issues and questions raised by the Commission's proposals, and have been very active in working with various industry groups on the complex and impactful issues contained in Regulation AT. Unfortunately, in preparing to draft our comments we have found that in some areas the preamble discussion and the text of the rules lead to inconsistent outcomes, which have required us and others to consult with CFTC staff to obtain a better understanding of the intended scope and ramifications of the proposal. Developing that understanding has unavoidably delayed the drafting of our comment.

Our work has been aided by the recent deliberations and commentary from the Technology Advisory Committee at its meeting on Feb. 23, which was delayed by approximately a month due to the January snow storm. Our request seeks a similar delay which will enable us to develop and document the need for constructive alternatives in various areas. We believe this delay should actually enhance meaningful comment and expedite the Commission's further deliberations on Regulation AT.

Thank you for your attention to this request for extension. If you or your staff should have any questions or comments or require further information regarding this request, please do not hesitate to contact the undersigned.

Sincerely,

Kathleen Cronin
Senior Managing Director / General Counsel

Trabue Bland
President of ICE Futures U.S.

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