



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

September 15, 2010

Scott A. Hill  
Chief Financial Officer  
IntercontinentalExchange, Inc.  
2100 RiverEdge Parkway  
Suite 500  
Atlanta, Georgia 30328

**Re: IntercontinentalExchange, Inc.  
Form 10-K for the year ended 12/31/2009  
Filed on February 10, 2010  
File No. 001-32671**

Dear Mr. Hill:

We have completed our review of your filing and do not have any further comments at this time.

Sincerely,

Sonia Gupta Barros  
Special Counsel