



DIVISION OF  
CORPORATION FINANCE

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

August 5, 2024

Andrew J. Surdykowski  
General Counsel  
Intercontinental Exchange, Inc.  
5660 New Northside Drive  
Atlanta, GA 30328

**Re: Intercontinental Exchange, Inc.  
Registration Statement on Form S-4  
Filed August 2, 2024  
File No. 333-281203**

Dear Andrew J. Surdykowski:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact John Stickel at 202-551-3324 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Finance