



International Securities Exchange

April 2, 2014

Elizabeth M. Murphy
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-0609

Re: File No. SR-ISE-2013-72

Dear Ms. Murphy:

We submit this letter in response to comments submitted to the U.S. Securities and Exchange Commission ("SEC" or "Commission") on the above-referenced rule filing in which the International Securities Exchange, LLC ("ISE") proposes to amend its rules to remove the size restriction on contra-party participation on a Qualified Contingent Cross ("QCC") order.¹

The three comment letters received by the Commission do not raise any significant issues related to removing the contra-party size restriction for QCC orders as proposed in this rule filing, but rather take issue generally with the QCC order type. The issues raised by commenters were well vetted by the Commission prior to approving the original QCC rule filing.² The ISE therefore does not believe that these letters raise new issues that are relevant to the approval of the current proposal, which is designed to ensure that large orders can benefit from participation with the largest possible pool of liquidity providers. Limiting the solicited side of a QCC order to larger entities that are willing to trade a minimum of 1,000 contracts may produce trades that are not at the best possible price. The ISE is seeking to enhance the QCC order type to ensure the best possible market for QCC orders, and does not agree with the commenters who seek to limit the way QCC operates for the benefit of larger participants.

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¹ See letter dated March 11, 2014 from Janet L. McGinness, Executive Vice President, NYSE Euronext, to Elizabeth M. Murphy, Secretary, Commission; letter dated March 14, 2014 from Darren Story, CFA; letter dated March 28, 2014 from Doug Patterson, CCO, Cutler Group LP.

² See Securities Exchange Act Release No. 63955 (February 24, 2011), 76 FR 11533 (March 2, 2011) (SR-ISE-2010-73).

We thank the Commission for the opportunity to respond to these comment letters, and respectfully request that the Commission approve the proposed rule change. If you have any additional questions, or if we can be of further assistance in this matter, please do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael J. Simon". The signature is stylized and cursive.

Michael J. Simon,
Secretary and General Counsel