



## ICE Futures U.S.

October 14, 2025

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### Updates to ICE Futures U.S. Exchange Rule 4.19 & Electronic Audit Trail Requirements to include ICE Binary Order API

In 2026, ICE Futures U.S. intends to introduce a new external API connection, the [ICE Binary Order API](#) (“Binary”), which will be offered alongside the existing FIX front-end API (with Binary, collectively referred to as “External Connections”). These options will enable clients to connect to the ICE Derivatives Trading Platform and submit orders or order modifications for Exchange-traded products.

Alongside this update, ICE Futures U.S. [Rule 4.19](#) will be amended<sup>1</sup> to require that each Clearing Member or Person with Direct Access ensure all orders submitted to the Exchange through its Direct Access for **both** External Connections adhere to the requirements of the Rule. Rule 4.19 also specifies the responsibilities to assign, populate, and maintain certain data fields for audit trail requirements applicable to any Clearing Member or Person with Direct Access. The electronic audit trail must be maintained for a minimum of five (5) years, with the most recent two (2) years readily accessible, pursuant to Exchange Rules 4.19 and 6.07.

#### Exchange Audit Trail Review

The Exchange will continue to perform annual reviews of Clearing Members and Persons with Direct Access to confirm adherence to the audit trail and recordkeeping requirements specified in Rule 4.19. Each Clearing Member and Person with Direct Access is required to maintain and provide, upon request, the audit trail records mandated by this Rule. Effective February 2026, any person that uses the Binary Order API may also be audited and must submit to the audit trail review.

IFUS Market Regulation does not mandate a particular format for Clearing Members or Persons with Direct Access to store such audit trail records; however, any party must, when requested, respond to the audit trail inquiry in the format established by the Exchange. Failure to do so may result in disciplinary action against the Clearing Member or Person with Direct Access.

For further information related to the Exchange’s audit trail requirements, please consult Exchange Rule 4.19 and table following this notice. Further information related to External Connections can be found within the [Binary](#) and [FIX](#) requirements documents.

#### **FOR MORE INFORMATION:**

Regulatory Contact:  
[Compliance-us@ice.com](mailto:Compliance-us@ice.com)

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<sup>1</sup> Pending completion of regulatory processes.

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### Rule 4.19(c) - TAG & FIELD DESCRIPTIONS

In accordance with revised Exchange Rule 4.19(c)(ii)<sup>2</sup>, each Clearing Member or Person with Direct Access is responsible to maintain, at a minimum, the dates and times of all order and trade messages sent to and received from the Exchange to the minimum precision specified in the Rule. Please note: data contained within date and time fields may depend on the message sent to or received from the Exchange. For the avoidance of doubt all dates and times should be maintained, examples of such fields include, but are not limited to, FIX Tag 60 (*TransactTime*).

Additionally, Clearing Members and Persons with Direct Access are required to maintain the details within the FIX Tags and Binary Field IDs contained in the table below for all order and trade messages sent to and received from the Exchange. For further information, please consult the [Binary](#) and [FIX](#) requirements documents for further description of the FIX Tags and Binary Field IDs below.

Field Description	FIX Tag & Binary Field ID	FIX Tag / Binary Field Name	Description
Client Order ID	11	ClOrdID / clOrdID	Must be universally unique per trading day
Order ID	37	OrderID / orderID	Assigned by the Exchange
Authorized Member	115	OnBehalfOfCompID / onBehalfOfCompID	Routing Member ID (Tag 115 left) / Authorized Member ID (Tag 115 right)  Assigned value used to identify firm originating message
Authorized Trader ID	116	OnBehalfOfSubID / onBehalfOfSubID	Routing Trader ID (Tag 116 left) / Authorized Trader ID (Tag 116 right)  Assigned value used to identify specific message originator
Authorized Group ID	144	OnBehalfOfLocationID / onBehalfOfLocationID	Routing Group ID (Tag 144 left / Authorized Group ID) (Tag 144 right)  Assigned value used to identify specific message originator's location
ETS Log-in ID	9139	OriginatorUserId / originatorUserId	User Log-in ID that is registered in the ICE system and used to access the ETS using Trader Logon message.

<sup>2</sup> Subject to the completion of regulatory processes.

Market ID	55	Symbol / symbol	Ticker Symbol (i.e. MarketId)
Buy/Sell Indicator	54	Side / side	Buy/Sell Indicator
Time In Force	59	TimeInForce / timeInForce	Specifies how long the order remains in effect
Quantity	38	OrderQty / orderQty	Order Quantity
Maximum Show	210	MaxShow / maxShow	For Reserve Quantity Orders. Maximum quantity within order to be shown to other customers
Order Type	40	OrdType / ordType	Order Type
Price	44	Price / price	Always required for limit orders
Stop Price	99	StopPx / stopPx	Required for stop and stop limit orders.
Order Status	9175	OrderState / orderState	State of the order

Clearing Firm	439	ClearingFirm / clearingFirm	Clearing Firm number
Clearing Account	440	ClearingAccount / clearingAccount	Number set up with the Clearing Firm
Customer Account Reference ID	9207	CustomerAccountRefID / customerAccountRefID	Contains customer account reference ID.
Manual Order Indicator	1028	ManualOrderIndicator / manualOrderIndicator	Indicates if the order is sent manually or generated by automated trading logic.
Self-Match Prevention ID	9821	SelfMatchPreventionID / selfMatchPreventionID	Identifier used to prevent self-trading.
Self-Match Prevention Instructions	9822	SelfMatchPreventionInstructions / selfMatchPreventionInstructions	Indicates cancel instructions when self-match prevention is triggered.