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BY ELECTRONIC MAIL (submissions@cftc.gov)

360 Trading Networks, Inc. · 521 Fifth Avenue, 38th Floor · New York, NY 10175

Ms. Melissa Jurgens, Secretary Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20581

Re: Regulation 40.6(a) Rule Certification 360 Trading Networks Inc. Rulebook Amendments

Dear Ms. Jurgens:

Pursuant to Section 5c(c) of the Commodity Exchange Act (the "Act") and Section 40.6(a) of the Regulations of the Commodity Futures Trading Commission (the "Commission"), 360 Trading Networks Inc. ("360T") hereby files the attached amendments to its Rulebook. The Rulebook has been amended in response to Commission staff guidance. The amended Rulebook will become effective on March 12, 2014.

A concise explanation and analysis of the amendments to the Rulebook and their compliance with applicable provisions of the Act, including Core Principles, and the Commission's Regulations thereunder, is attached hereto as <u>Exhibit A</u>. A clean copy of the amended Rulebook is attached hereto as <u>Exhibit B</u>, and a copy of the Rulebook marked to show changes against the version submitted to the Commission on November 25, 2013 is attached hereto as <u>Exhibit C</u>.

360T hereby certifies that: (i) the amended Rulebook complies with the Act and the Commission's regulations thereunder; and (ii) a notice and copy of this submission is being concurrently posted on 360T's web site. There were no substantive opposing views to the amendments to the Rulebook.

Please contact the undersigned at 44 020 3508 6344 or martin.oakley@360t.com if you have any questions or you would otherwise like to discuss this further.

Sincerely,

/s/ Martin Oakley Chief Compliance Officer

Attachments

<u>Exhibit A</u>

Summary: The 360T Rulebook has been amended in response to published Commission staff guidance and comments and questions received from users and potential users of 360T. A clean copy of the amended Rulebook is attached hereto as <u>Exhibit B</u>; a copy of the Rulebook marked to show changes against the version submitted to the Commission on November 25, 2013 is attached hereto as <u>Exhibit C</u>.

Capitalized terms used but not defined herein have the meanings assigned to them in the Rulebook.

Amendment	Explanation
Cover Page	
Added date that the Rulebook takes effect	Clarification
<u>Rule 101</u>	
Amended definition of Block Trade to reflect a public traded swap transaction that 1) involves a swap listed on a registered Swap Execution Facility; 2) occurs away from the Company's system; 3) has a notional amount above the appropriate minimum block size; and 4) is reported subject to the Rules and appropriate time delay.	Commission Regulation 43.5
Rule 101Deleted reference that Required Transactions cannot be Block Trades.	Commission Regulation 37.9(a)(2)