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BY ELECTRONIC MAIL (submissions@cftc.gov)

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 and comments and questions received from users and potential users of 360T. The amended Rulebook will become effective on December 11, 2013.

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 Exhibit A. A clean copy of the amended Rulebook is attached hereto as Exhibit B, and a copy of the Rulebook marked to show changes against the version submitted to the Commission on August 28, 2013 is attached hereto as Exhibit C.

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

Exhibit A

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 Exhibit B; a copy of the Rulebook marked to show changes against the version submitted to the Commission on August 28, 2013 is attached hereto as Exhibit C.

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

Amendment	Explanation
<u>Table of Contents</u> 1. Updated page references. 2. Clarified the heading of Rule 312. 3. Added Rule 313	1. Update 2. Clarification 3. Addition (see Rule 313 below)
<u>Rule 101</u> Removed defined term “User License Agreement”	Removed unused term
<u>Rule 301(b)</u> Clarified that a Participant may designate an employee, agent or authorized contractor as an Authorized User.	Clarification
<u>Rule 304(c)(1)</u> Corrected typographical error.	Typographical error
<u>Rule 312</u> Clarified that each Participant, Authorized Trader and ISV must pay “dues and fees” instead of “dues, assessments and fees.”	Removed redundant term
<u>Rule 313</u> Added new Rule to clarify that 360T will notify market participants of Business Days and Trading Hours applicable for each Swap.	Clarification
<u>Rule 401(a)(8)</u> Clarified that each market participant is required to keep books and records relating to its use of the Company.	Clarification
<u>Rule 401(b)</u> Amended to limit circumstances in which	Core Principle 2; Commission Regulation

Participant is responsible for Orders, RFQs and transactions effected on the Trading System.	37.201(a)
<u>Rule 404(a)</u> Clarified that a Participant must provide financial information as the Company may reasonably require.	Clarification
<u>Rule 517(b)</u> Clarified that the Rule prohibiting pre-arranged, pre-negotiated and noncompetitive execution applies to transactions that are subject to the Rules.	Clarification
<u>Rule 525</u> Amended to provide that the Company will issue a written communication for an uncleared swap promptly after such swap is executed. The written communication for the swap, together with the parties' existing documents and agreements governing such swap, will serve as a confirmation of the swap. Each written communication issued by 360T is deemed to incorporate by reference the parties' existing documents and agreements governing the swap. In the event of an inconsistency between the written communication issued by 360T and the parties' existing documents and agreements governing the swap, the written communication will prevail.	Commission Regulation 37.6(b)
<u>Rule 528(d)</u> 1. Removed provision authorizing 360T to submit swap data to a registered swap data repository. 2. Removed provision in which market participants consent to the maintenance of swap data by a registered swap data repository.	Existing Rules 528 and 904(e) authorize 360T to submit swap data on behalf of Participants. Parts 43 and 45 of Commission Regulations
<u>Rule 903(a)</u> Amended to allow persons to disclose proprietary information under certain circumstances enumerated in Rule 904.	Commission Regulations 1.31 and 1.35
<u>Rule 904(j)</u> Clarified that disclosures permitted under the Rules must be expressly permitted.	Clarification
<u>Rule 905</u> Revised to provide that Participants, Authorized	

Traders, Authorized Users and Clearing Firms may record conversations and retain copies of electronic communications between them and Company Officials.	Commission Regulation 1.35(a)
<u>Rule 1003(a)</u> Clarified that Clearing Firm guarantee relates to Swaps that are intended to be cleared.	Clarification