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September 13, 2016

BY ELECTRONIC MAIL (submissions@cftc.gov)

Christopher J. Kirkpatrick
Office of the Secretariat
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 and User Guides Amendments**

Dear Mr. Kirkpatrick:

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 and User Guides. The Rulebook and User Guides have been amended in response to Commission staff guidance and comments. The amended Rulebook and User Guides will become effective on September 27, 2016.

A concise explanation and analysis of the amendments to the Rulebook and User Guides 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 December 29, 2015 is attached hereto as Exhibit C. Clean and marked copies of the User Guide for Market Takers is attached as Exhibit D and Exhibit E, respectively. Clean and marked copies of the User Guide for Market Makers is attached as Exhibit F and Exhibit G, respectively.

360T hereby certifies that: (i) the amended Rulebook and User Guides comply 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.

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

Enclosure

Exhibit A

Summary of Rulebook Changes: 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 December 29, 2015 is attached hereto as Exhibit C.

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

Rule	Explanation	Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter
Cover Page	Updates effective date.	Regulation 40.6
Cover Page	Update of company logo	Regulation 40.6
Table of Contents	Updates table of contents to reflect changes listed below.	See below
Rule 504	Per Commission staff guidance, align rule with Commission Regulation by including the attempt to engage in the mentioned fraudulent acts and abusive trading practices and including the prohibition to engage or attempt to engage in cornering, manipulative device and artifices to defraud.	Regulation 180.1 Sec 9(a)(2) CEA
Rule 505	Per Commission staff guidance, align rule with Commission Regulation by including the attempt to engage in fictitious or noncompetitive transactions.	Regulation 180.1
Rule 507	Per Commission staff guidance, align rule with Commission Regulation by replacing the prohibition of attempt to manipulate or manipulate the market in any Swap with the attempt to manipulate or manipulate the price in any Swap and including the prohibition of corner or attempt to corner any Swap or any commodity underlying a Swap, or engage in any activity or conduct otherwise prohibited under CEA sections 9(a)(2) or 4c(a)(5) or Commission Regulations 180.1(a) or 180.2	Sec. 9(a)(2) CEA Sec. 4c(a)(5) CEA Regulation 180.1 Regulation 180.2

Rule 508	Per Commission staff guidance, align rule with Commission Regulation by including the prohibition to attempt to engage in any trading practice or conduct that constitutes a “disruptive trading practice”	Section 4c(a) 5 CEA
Rule 509	Per Commission staff guidance align rule with Commission Regulation by including the attempt to make a misstatement of a material fact to the Company and replace the word “knowingly” in regards to omitting to state a material fact with “intentionally or recklessly”.	Regulation 180.1 37.203 (a)
Rule 510	Per Commission staff guidance, align rule with Commission Regulation by including the prohibition of the attempt to the mentioned prohibited practices in regards to Misuse of the Trading System.	Regulation 180.1 37.203 (a)
Rule 512 (b)	Per Commission staff guidance, align rule with Commission Regulation by including the prohibition of attempt to withhold or withdraw customer orders and the attempt to enter an Order as described in 5.12 (b).	Regulation 180.1 37.203 (a)
Rule 513	Per Commission staff guidance, align rule with Commission Regulation by including the prohibition of attempt to take the opposite side of Customer Orders and to attempt to trade on a central limit order book against a Customer Order for its own account.	Regulation 180.1 37.203 (a)
Rule 514	Per Commission staff guidance, align rule with Commission Regulation by including the prohibition of attempt to disclose the terms of an Order and the attempt to solicit or induce another Person to disclose such information.	Regulation 180.1 37.203 (a)
Rule 515	Per Commission staff guidance, align rule with Commission Regulation by including the prohibition of attempt in regards to simultaneous buy and sell orders for different beneficial owners.	Regulation 180.1 37.203 (a)

Rule 516	Per Commission staff guidance, align rule with Commission Regulation by including the prohibition of attempt in regards to wash sales.	Regulation 180.1 37.203 (a)
Rule 517	Per Commission staff guidance, align rule with Commission Regulation by including the prohibition of attempt concerning “money passing”, pre-arranged, pre-negotiated and noncompetitive transactions.	Regulation 180.1 37.203 (a)

Summary of Changes to User Guide for Market Takers: A clean copy of the User Guide for Market Takers is attached hereto as Exhibit D; a copy of the User Guide for Market Takers marked to show changes against the version submitted to the Commission on December 29, 2015 is attached hereto as Exhibit E.

Section	Explanation	Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter
Cover Page	Inserts effective date.	Regulation 40.6
Cover Page	Update of company logo	Regulation 40.6

Summary of Changes to User Guide for Market Makers: A clean copy of the User Guide for Market Makers is attached hereto as Exhibit F; a copy of the User Guide for Market Makers marked to show changes against the version submitted to the Commission on December 29, 2015 is attached hereto as Exhibit G.

Section	Explanation	Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter
Cover Page	Inserts effective date.	Regulation 40.6
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