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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 and questions received from users and potential users of 360T. The amended Rulebook and User Guides will become effective on December 29, 2015.

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 November 26, 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 November 26, 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
Table of Contents	Updates table of contents to reflect changes listed below.	See below
Rule 201(c)	Includes a reference to new paragraph (e).	See below
Rule 201(e)	Provides that at least 20% of the Board must be comprised of individuals that are knowledgeable of derivatives trading or financial regulation or are otherwise capable of contributing to Board deliberations and additionally meet each of the following requirements: 1.Are not Participants or Authorized Users; 2.Are not currently salaried employees of 360T; 3.Are not primarily performing services for 360T in a capacity other than as a Director, and 4.Are not officers, principals or employees of a Participant or an Authorized Trader.	Regulation 1.64
Rule 406(b)	Removes the carve-out for market participants that do not engage in substantial trading.	Regulation 37.404
Rule 701(i)	Provides that at least one member of each major Review Panel, Disciplinary Panel or Appeal Panel shall be an individual who is	Regulation 1.64

	not a Participant or an Authorized User whenever such Panel is acting with respect to a disciplinary action in which: (1) the subject of the action is a member of the Board or a major Review Panel, Disciplinary Panel or Appeal Panel; or (2) any of the charged, alleged or adjudicated Rule violations involve (i) manipulation or attempted manipulation of the price of a Swap, or (ii) conduct which directly results in financial harm to a Customer.	
Rule 710(b)	Provides that each such Panel shall include sufficient different membership interests so as to ensure fairness and to prevent special treatment or preference for any person in the conduct of the Panel's responsibilities.	Regulation 1.64
Rule 715(f)	Provides that each Appeal Panel shall include sufficient different membership interests so as to ensure fairness and to prevent special treatment or preference for any person in the conduct of the Panel's responsibilities.	Regulation 1.64

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 November 26, 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
Section 2	Provides additional clarity on SEF trading enablement/disablement.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)

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 November 26, 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
Section 2	Provides additional clarity on SEF trading enablement/disablement and indication of collateralization.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)