



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

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

Phone: +1 212 776 2900
Fax: +1 212 776 2902
E-Mail: info@360t.com

www.360t.com

November 25, 2015

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 10, 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 September 30, 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: The 360T Rulebook has been amended in response to 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 September 30, 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 101 (“Authorized User”)	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 101 (“Block Trade”)	Per Commission staff guidance, 360T has removed certain references to Block Trades.	Core Principle 1
Rule 101 (“Cleared Swap”)	Per Commission staff guidance, 360T has removed certain references to Cleared Swaps.	Core Principle 1
Rule 101 (“Clearing Firm”)	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 101 (“Emergency”)	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 101 (“Package Transaction”)	Per Commission staff guidance, 360T has removed certain references to Package Transactions.	Core Principle 1
Rule 101 (“Risk-Based Limits”)	Per Commission staff guidance, 360T has removed certain references to Risk-Based	Core Principle 1

	Limits.	
Rule 101 ("Termination Event")	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 201(c)	Provides that the Board's membership fairly represents the diversity of interests at 360T, including the interests of banks, futures commission merchants, corporate treasury departments, institutional traders and asset managers that trade on the Trading System, as appropriate.	Regulation 1.64
Rule 302(a)	Per Commission staff guidance, 360T has removed certain references to self-clearing Participants and Clearing Firms.	Core Principle 1
Rule 305	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 307	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 310(d)	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 401(a)(8)	Clarifies that records must be kept as required by Applicable Law, including, but not limited to, Commission Regulations 1.31 and 1.35.	Regulations 1.31 and 1.35
Rule 406	Provides that any market participant that is not already subject to Rule 401(a)(8) and that conducts substantial trading on the Trading System shall keep, or cause to be kept, complete and accurate books and records, including but not limited to records of its trading in Swaps, in the instruments underlying any such Swaps or in any instrument or index used as a reference price for a Swap, or in any related derivatives markets, for at least five years and make such books and records available to 360T, the Regulatory Services Provider and the	Regulation 37.404(b)

	Commission in accordance with Applicable Law. For purposes of this provision, “substantial trading” shall be determined by 360T its sole discretion upon prior written notice, taking into consideration the market participant’s average daily trading volume and open interest for one or more Swaps effected on or pursuant to the Rules.	
Rule 510	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 520(c)	Removes reference to certain suspense accounts.	Core Principle 1
Rule 520(d)	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 521(a)	Clarifies that 360T shall establish, as is necessary or appropriate, position limits for one or more Swaps to reduce the potential threat of market manipulation or congestion.	Core Principle 6 Regulation 37.600
Rule 521(d)	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 521(h)	Clarifies that 360T demonstrates compliance with Commission Regulation 37.600 by sending the Commission a list of Permitted Transactions traded on or pursuant to the Rules.	Core Principle 6 Regulations 37.600 and 37.601 Appendix B to Part 37
Rule 522(a)	Clarifies that 360T shall establish, as is necessary or appropriate, position accountability levels for one or more Swaps to reduce the potential threat of market manipulation or congestion.	Core Principle 6 Regulation 37.600
Rule 524(a)	Provides that 360T supports Permitted Transactions only.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 524(c)	Per Commission staff guidance, 360T has	Core Principle 1

	removed the RFQ requirements related to Required Transactions.	
Rule 524(d)	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Rule 525(d)	Clarifies that all Participants must maintain all Terms Incorporated by Reference in accordance with Commission Letter No. 15-25, which expires on March 31, 2016.	Letter No. 15-25
Rule 526(a) (former)	Per Commission staff guidance, 360T has removed the Rules related to Swaps that are not accepted for clearing.	Core Principle 1
Rule 526(a)(1)	Clarifies that the provisions of paragraph (a)(1) supersede the other provisions of Rule 526.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(a)(2)	Provides that, in event that 360T determines to adjust trade prices or bust a trade in accordance with paragraph (a)(2), 360T may consider any relevant information, including, but not limited to, the last trade price of the Swap, a more recent price for a different maturity date, the price of the same or related Swap established in another venue or another market and the market conditions at the time of the trade.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(b)(1)	Provides that 360T may review a central limit order book ("CLOB") trade based upon a request by an Authorized Trader. This paragraph also has been revised to include a sub-header.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(b)(2)	Inserts a sub-header.	N/A
Rule 526(b)(3)	Provides that 360T will issue an alert to all Participants and Authorized Traders. This paragraph also has been revised to include a sub-header.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(b)(4)	Renumbers the paragraph and renumbers the	See below

	cross-reference to paragraph (g).	
Rule 526(b)(5)	Clarifies that 360T will issue an alert to all Participants and Authorized Traders. This paragraph also has been renumbered.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(b)(6)	Removes the provision that provides that 360T will issue a notice regarding cancellation as duplicative of new paragraph (b)(8). This paragraph also has been renumbered.	See below
Rule 526(b)(7)	Renumbers the paragraph.	See above
Rule 526(b)(8)	Provides that a decision by 360T to adjust CLOB trade prices or bust a CLOB trade will be made as soon as practicable, and 360T will notify all Participants and Authorized Traders, the Swap Data Repository and, if applicable, the Derivatives Clearing Organization of any such decision.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(c)(1)	Provides that 360T may determine to review an RFQ upon request by a Participant or Authorized Trader.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(c)(2)	Provides that 360T will determine whether or not an RFQ will be subject to review. In the absence of a timely request for review, during volatile market conditions, upon the release of significant news, or in any other circumstance in which 360T deems it to be appropriate, 360T may determine, in its sole discretion, that an RFQ shall not be subject to review.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(c)(3)	Provides that upon deciding to review an RFQ, 360T will promptly issue an alert to all affected Participants and/or Authorized Traders indicating that the trade is under review.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(c)(4)	Provides that once 360T has agreed to place an RFQ under review, the Participant or Authorized Trader requesting to cancel or	Core Principles 2 and 4 Regulations 37.200(c),

	adjust the trade shall, where it has not done so already, confirm in writing to this effect. 360T shall then request the other Participant or Authorized Trader involved in the RFQ to confirm in writing its willingness to cancel or adjust the trade.	37.201(a) and 37.400(a)
Rule 526(c)(5)	Provides that where the other Participant or Authorized Trader involved in the RFQ does not confirm in writing its willingness to cancel or adjust the trade, 360T shall issue an alert to all affected Participants and/or or Authorized Traders indicating that the trade shall stand. (As noted above, this provision is subject to paragraph (a).)	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(c)(6)	Provides that where the other Participant or Authorized Trader involved in the RFQ confirms in writing its willingness to cancel or adjust the trade, 360T shall cancel or adjust the trade accordingly.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(c)(7)	Provides that busted trade prices and any prices that have been adjusted shall be cancelled in 360T's official record of time and sales. Trades that are price-adjusted shall be inserted in the time and sales record at the adjusted trade price.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(c)(8)	Provides that a decision by 360T to adjust RFQ trade prices or bust an RFQ will be made as soon as practicable, and 360T shall notify the affected Participants and/or Authorized Traders, the Swap Data Repository and, if applicable, the Derivatives Clearing Organization of any such decision.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Rule 526(d)-(i)	Renumbers the paragraphs.	See above
Rule 528(a)	Clarifies that 360T will report Reportable Swap Data for each Swap executed on or pursuant to the Rules to a Swap Data Repository listed in paragraph (c) as soon as technologically practicable following execution. The relevant Swap Data Repository shall publicly disseminate the information in Appendix A to Part 43 of Commission Regulations in a consistent form	Parts 43 and 45 of Commission Regulations

	and manner for Swaps within the same asset class.	
Rule 528(b)	<p>Provides that if both counterparties to a Swap executed on or pursuant to the Rules are equal in the hierarchy set out in Commission Regulations, the Reporting Counterparty for such Swap shall be determined as follows:</p> <ul style="list-style-type: none"> (i) With respect to a non-deliverable forward, the Reporting Counterparty is the counterparty selling the currency that occurs first in the 26-letter English alphabet. (ii) With respect to a foreign currency option, the Reporting Counterparty is the seller of the option. 	Regulation 45.8
Rule 528(c)	Provides that 360T has designated DTCC Data Repository (U.S.) LLC as the Swap Data Repository to which it will report Reportable Swap Data for each Swap executed on or pursuant to the Rules.	Core Principle 1
Rule 528(d)	Clarifies that each Participant, Authorized Trader and Authorized User that enters an Order or a Request for Quote into the Trading System shall include with each such Order or Request for Quote sufficient information to enable 360T to report all Reportable Swap Data pursuant to Parts 43 and 45 of Commission Regulations.	Parts 43 and 45 of Commission Regulations
Rule 601	Per Commission staff guidance, 360T has removed certain references to Block Trades.	Core Principle 1
Rule 602	Per Commission staff guidance, 360T has removed certain references to Block Trades.	Core Principle 1
Rule 712(g)	Fixes typographical error.	N/A
Rule 713(b)	Provides that 360T will provide a copy of a Disciplinary Panel's order to the respondent not later than 30 days after the rendering of a final decision.	Regulations 9.11 and 9.12
Rule 714(a)	Per Commission staff guidance, 360T has removed certain references to Clearing	Core Principle 1

	Firms.	
Rule 715(n)	Provides that the Appeal Panel will issue a written decision and provide a copy to the parties not later than 30 days after the rendering of a final decision. The written decision will become effective no sooner than 15 days after written notice of the decision is delivered to the parties.	Regulations 9.11 and 9.12
Rule 716(c)	Provides a schedule listing the recommended summary fines.	Appendix B to Part 37
Rule 719	Provides that 360T will provide final written notice of a Disciplinary Proceeding through NFA's Background Affiliation Status Information Center	Regulations 9.11 and 9.12
Rule 905	Per Commission staff guidance, 360T has removed certain references to Clearing Firms.	Core Principle 1
Chapter 10	Per Commission staff guidance, 360T has removed certain references to Cleared Swaps and Clearing Firms.	Core Principle 1
Appendix 1	Inserts currency list that was certified by 360T on September 30, 2013. In addition, the contract specifications were revised to reference Part 150 of Commission Regulations. The remaining changes are non-substantive.	Core Principle 3

Summary of Changes to User Guide for Market Takers: The User Guide for Market Takers has been amended in response to Commission staff guidance and comments and questions received from users and potential users of 360T. 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 September 30, 2015 is attached hereto as Exhibit E.

Section	Explanation	Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter
Section 1	Non-substantive changes	N/A
Section 3.1	Provides additional clarity on the means by which a user may effect an NDF transaction.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 3.2	Provides additional clarity on the means by which a user may effect an NDS transaction.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 3.3	Provides additional clarity on the means by which a user may effect an FX options transaction.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 4	Removes references to Required Transactions. Additional changes are intended to better clarify the system's functionality.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 5	Provides information related to special execution modes, including multiple executions and rollover and early settlement of trades.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 6	Changes Section number. Provides additional clarity on the means by which a user may effect an order book transaction. Removes reference to Commission Regulation 37.9.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)

Section 7	Changes Section number.	See above
-----------	-------------------------	-----------

Summary of Changes to User Guide for Market Makers: The User Guide for Market Makers has been amended in response to Commission staff guidance and comments and questions received from users and potential users of 360T. 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 September 30, 2015 is attached hereto as Exhibit G.

Section	Explanation	Core Principle or other CEA Provision, Commission Regulation and/or Commission Staff Letter
Section 1	Non-substantive changes	N/A
Section 3.2	Provides additional clarity on the means by which a user may effect an NDS transaction.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 3.3	Provides additional clarity on the means by which a user may effect an FX options transaction.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 5	Provides information related to special execution modes, including multiple executions and rollover and early settlement of trades.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 6	Changes Section number. Provides additional clarity on the means by which a user may effect an order book transaction. Removes reference to Commission Regulation 37.9.	Core Principles 2 and 4 Regulations 37.200(c), 37.201(a) and 37.400(a)
Section 7	Changes Section number.	See above