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September 30, 2015

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 October 15, 2015.

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 18, 2015 is attached hereto as Exhibit C. The Rulebook also includes both a market maker User Guide Exhibit D and market taker User Guide Exhibit E.

360T hereby certifies that: (i) the amended Rulebook and accompanying 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

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 18, 2015 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>Cover Page</u> Revised effective date	Update
<u>Table of Contents</u> 1. Updated page references. 2. Added Rule 1001	1. Update 2. Addition (see Rule 1001 below)
<u>Rule 101</u> Added defined terms “Cleared Swap” and “Risk Based Limits” Revised defined term “Package Transaction”	New definitions added due to their use in new Rule 1001. Package Transaction definition revised to more closely track CFTC no-action letters.
<u>Rule 309</u> Clarifies that the Company will provide impartial access to the Trading System	Core Principle 2. Commission Regulation 202(a).
<u>Rule 301(f)</u> Clarifies that the Company will provide impartial access to independent software vendors.	Core Principle 2. Commission Regulation 202(a).
<u>Rule 306</u> Clarifies that ISVs may not effect Transactions or receive the Company’s Market Data solely due to acting as ISVs.	Clarification
<u>Rule 401(a)(8)</u> Clarifies that market participants are required to keep books and records in accordance with Commission Regulation 1.31 (if applicable) and make such records available to the Department of Justice upon request.	Clarification

<u>Rule 521</u> Clarifies the circumstances under which the Company may adopt position or accountability limits.	Core Principle 6; Commission Regulation 37.600
<u>Rule 526(c) and (d)</u> Clarifies that the Company's review, price adjustment and trade bust procedures apply to transactions effected on the Company's central limit order book.	Clarification
<u>Rule 526(e) and (f)</u> Clarifies that all cancellations of transactions require Company consent.	Clarification
<u>Rule 527(g)</u> Clarifies that Company's limitation of liability provisions do not relieve it of its obligations under the CEA.	Commission Regulation 37.100
<u>Rule 701(a)</u> Clarifies that the Company's disciplinary rules apply to all persons that are subject to the Company's jurisdiction.	Commission Regulation 37.206
<u>Rule 701(d)</u> Clarifies that all persons subject to the Company's jurisdiction must cooperate with the Company in connection with any inquiries, investigations and/or disciplinary proceedings.	Commission Regulation 37.206
<u>Rule 719</u> Clarifies that the Company will notify the CFTC of final decisions in disciplinary proceedings.	Commission Regulation 9.11(a)
<u>Rule 906(b)</u> Clarifies that the Company may enter into information sharing or other arrangements with the CFTC.	Core Principle 5
<u>Rule 1001(a)</u> Provides that the Company will facilitate pre-execution credit checks by Clearing Firms.	Staff Guidance on Swaps Straight-Through Processing (September 26, 2013)