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August 04, 2015

**Submitted via Electronic Mail ([submissions@cftc.gov](mailto:submissions@cftc.gov)) and Portal**

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**

Ladies and Gentlemen:

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. The amended Rulebook will become effective on August 18, 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 March 13, 2015 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.

360T Rulebook includes user guides for both Market Makers and Market Takers which are subject to Request for Confidential Treatment.

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,

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 May 21, 2015 is attached hereto as Exhibit C.

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

<b>Amendment</b>	<b>Explanation</b>
<u>Cover Page</u> Revised effective date	Update
<u>Table of Contents</u> Revised page numbers.	Update
<u>Chapter 1:</u> Definitions	Update to include definition of “Breakage Agreement” and “Package Transaction”.
<b><u>Chapter 5: Trading Practices</u></b>	
Rule 525 (c), and new section (d): amended to include incorporation of relevant terms.	Updated for SEF to avail itself of the no-action relief provided in no-action letters 15-24, concerning erroneous trades and 15-25, concerning confirmation.
Rule 525 (e): previously 525 (d).	Section adjustment
Rule 526 (a): amendment to trade cancellation and price adjustment process.	Updated for SEF to avail itself of the no-action relief provided in no-action letters 15-24, concerning erroneous trades and 15-25, concerning confirmation.
<b><u>APPENDIX 1</u></b>	
No changes	