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May 21, 2015

Submitted via Electronic Mail (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 June 5, 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.

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 December 24, 2014 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> Revised page numbers.	Update
<u>Chapter 1:</u> Definitions	No changes
<u>Chapter 5: Trading Practices</u>	
Rule 504: amended to include all potential abusive trading practices	CFTC Regulation 37.203(a)
Rule 520 (b) (1): addition of new section (i) to require Participants to have the ability to produce documents as specified in rule 525 or other freestanding agreements	
Rule 525: amended to reflect that confirmation and execution occur at the same time	CFTC Regulation 37.6(b)
<u>Chapter 9: Miscellaneous</u>	
Rule 901: amended to more accurately track of CFTC Regulation	CFTC Regulation 37.6(a)(3)
<u>APPENDIX 1</u>	
Product terms and conditions	New Section