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Submitted via CFTC 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 360T business development. The amended Rulebook will become effective on January 14, 2019.

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 December 15, 2017 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 7862 7509 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

Exhibit A

Summary: The 360T Rulebook has been amended in response to 360T business development. 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 15, 2017 is attached hereto as Exhibit C. Minor changes have been made to the User Guide for Market Takers and User Guide for Market Maker, they are attached hereto as Exhibit D and Exhibit E and a copy of the User Guides marked to show changes are attached hereto as Exhibit F and Exhibit G respectively.

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> Added Rule 410 Market Participant Books and Records Added Rule 430 Prime Broker Trades Adjusted page numbering accordingly	Update
<u>Rule 101</u> Amended the definition of Customer and Participant to clarify the term shall not include Prime Brokers. Added Non-Cleared Swap, Non-Cleared Swap Agreement, SEF, SEF Activity and SEF Prime Broker Agreement definitions. Amended definition of Prime Broker and Prime Broker Transaction.	Update
<u>Rule 305(h)</u> Added language to clarify Prime Brokers responsibility with accessing or entering orders on Company's Trading Platform.	Clarification
<u>Rule 310(c)</u> Amended the word effect to effected.	Correction
<u>Rule 410</u> Added new Rule to specify the books and records requirements applicable to each Market Participant.	Addition
<u>Rule 505</u> Added language to clarify Prime Broker responsibility with Rule 505.	Clarification

<u>Rule 506</u> Added language to clarify Prime Broker responsibility with Rule 506.	Clarification
<u>Rule 507</u> Added language to clarify Prime Broker responsibility with Rule 507.	Clarification
<u>Rule 508</u> Added language to clarify Prime Broker responsibility with Rule 508.	Clarification
<u>Rule 512(d)</u> Added language to clarify Prime Broker responsibility with Rule 512.	Clarification
<u>Rule 513(d)</u> Added language to clarify Prime Broker responsibility with Rule 513.	Clarification
<u>Rule 514(c)</u> Added language to clarify Prime Broker responsibility with Rule 514.	Clarification
<u>Rule 515(e)</u> Added language to clarify Prime Broker responsibility with Rule 515.	Clarification
<u>Rule 516</u> Added language to clarify Prime Broker responsibility with Rule 516.	Clarification
<u>Rule 517(d)</u> Added language to clarify Prime Broker responsibility with Rule 517.	Clarification
<u>Rule 520(d)</u> Changed the word Person to Participant	Update
<u>Rule 524(d)</u> Added part (1), (2) and (3) which clarifies Prime Brokers responsibility with Rule 524.	Addition
<u>Rule 525(d)</u> Updated the CFTC No-Action Letter that addresses the Company maintaining all relevant Terms Incorporated by Reference.	Update
<u>Rule 528(b)(1), (2), (3) and (4)</u> Added language to clarify who is responsible for being the Reporting Counterparty.	Clarification

<u>Rule 530</u> Added Rule 530 to expound a Prime Brokers responsibility in transactions.	Addition
<u>User Guide Market Taker Cover Page</u> Updated date and removed word Exhibit from header	Update
<u>User Guide Market Taker Section 3.1</u> Amended RFQ to RFS to be consistent with the Marker Maker User Guide	Update
<u>User Guide Market Taker Section 3.2</u> Amended RFQ to RFS to be consistent with the Marker Maker User Guide	Update
<u>User Guide Market Taker Section 3.3</u> Amended RFQ to RFS to be consistent with the Marker Maker User Guide	Update
<u>User Guide Market Maker Cover Page</u> Updated date and removed word Exhibit from header	Update
<u>User Guide Market Maker Section 1</u> Removed sentence “as shown in the following screen captures” as there aren’t applicable screen captures.	Correction
<u>User Guide Market Maker Section 3.2</u> Amended RFQ to RFS to be consistent with the Marker Taker User Guide	Update
<u>User Guide Market Maker Section 3.3</u> Amended RFQ to RFS to be consistent with the Marker Taker User Guide	Update
<u>User Guide Market Maker Section 5</u> Replaced phrase “as described previously” with “Two” to clarify section 5.	Update