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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 as well as 360T business development. The amended Rulebook will become effective on March 27, 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 December 24, 2014 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,

/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 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> 1. Further defined certain defined terms: a. Amended Rule reference of “No-Bust Range” b. Introduced definition of “Prime Broker” and “Prime Broker Transaction” 2. Conformed definitions to their appearance in the Rulebook	1. Clarification 2. Clarification
<u>Rule 401(a)(8)</u> Amended Rule 401(a)(8) to state that records are to be made available to the CFTC upon request.	CFTC Regulation 37.404
<u>Rule 504</u> Amended to restrict Persons subject to 360T’s jurisdiction from engaging in front running, fraudulent trading, trading ahead of customers, trading against customer orders, and improper cross trading.	CFTC Regulation 37.203(a)
<u>Rule 524</u> Revised Rule to require that Required Transactions must be executed using the order book or request for quote functionality.	CFTC Regulation 37.9
<u>Rule 526(d)</u> Amended paragraph reference to No-Bust Range.	Clarification

<u>Rule 526(e)</u> Added new Rule 526(e) to allow the cancellation of Prime Broker Transactions under the circumstances described in the Rule. A Prime Broker as a counterparty to a Prime Broker Transaction needs to have the ability to cancel the Prime Broker Transaction if the Participant that trades in the Prime Broker's name exceeds the scope of authority granted to it by the Prime Broker.	Core Principle 2
<u>Rule 526(i)</u> Added new Rule 526(i) to ensure that trade price adjustments or trade cancellations will be transparent to the market and subject to standard that are clear, fair and publicly available.	CFTC Regulation 37.203(e)
<u>Rule 526(g)-(j)</u> Adjusted numbering.	Clarification
<u>Rule 712</u> Amended Rule to require that all Disciplinary Proceedings are fair and conducted before members of the Disciplinary Panel.	CFTC Regulation 37.206(c)(1)
<u>Rule 712(g)</u> Added new Rule 712(g) to ensure that if the respondent has requested a hearing, a copy of the hearing will be made and become part of the record. The record will not be required to be transcribed unless the circumstances as detailed in Rule 712(g) are met.	CFTC Regulation 37.206(c)(2)
<u>Rule 903(d)</u> Amended Rule 903(d) that prohibits 360T from using for business or marketing purposes any proprietary data or personal information it collects for the purpose of fulfilling its regulatory obligations, unless the person from whom it collects or receives such data or information consents in writing to 360T's use of such data or information in such manner.	CFTC Regulation 37.7
<u>Rule 904</u> Adjusted numbering.	Clarification
<u>Rule 904(c)</u>	Core Principle 5

Added Rule 904(c) to allow 360T to provide non-public information to the CFTC.	
<u>Rule 912</u> Adjusted numbering	Clarification
<u>Rule 912(b)(3)</u> Added Rule 912(b)(3) to allow 360T to order the fixing of a settlement price in the event of an emergency.	Core Principle 8