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April 17, 2020

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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 functionality development. The amended Rulebook will become effective on May 1st, 2020.

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 January 14, 2019 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 functionality 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 January 14, 2019 is attached hereto as Exhibit C. No changes have been made to the User Guide for Market Takers, User Guide for Market Maker or User Guide for 360TGTX but for reference they are attached hereto as Exhibit D, Exhibit E and Exhibit F 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 back Rule 601 Block Trades Added back Rule 602 Time-Stamp Requirements for Block Trades Amended page numbers	Update
<u>Rule 517 (b) (4)</u> Fixed grammar typo	Amended
<u>Rule 528 (b) (3)</u> Fixed grammar typo	Amended
<u>Rule 601</u> Added the block trade language that was previously reserved	Update
<u>Rule 602</u> Added the block trade language that was previously reserved	Update