

360 Trading Networks, Inc. 521 Fifth Avenue, 38th Floor New York, NY 10175

Phone: +1 212 776 2900 Fax: +1 212 776 2902 E-Mail: info@360t.com

July 19, 2017 www.360t.com

Submitted via CFTC Portal

Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20581

360 Trading Networks, Inc. · 521 Fifth Avenue, 38th Floor · New York, NY 10175

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 August 2, 2017.

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 <u>Exhibit A.</u> A clean copy of the amended Rulebook is attached hereto as <u>Exhibit B.</u> and a copy of the Rulebook marked to show changes against the version submitted to the Commission on September 27, 2016 is attached hereto as <u>Exhibit C.</u>

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 comments and questions received from users and potential users of 360T. A clean copy of the amended Rulebook is attached hereto as <u>Exhibit B</u>; a copy of the Rulebook marked to show changes against the version submitted to the Commission on September 27, 2016 is attached hereto as <u>Exhibit C</u>. No changes have been made to the User Guide for Market Takers or User Guide for Market Maker but for reference they are attached hereto as <u>Exhibit D</u> and <u>Exhibit F</u> respectively.

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

Amendment	Explanation
Cover Page	
Revised effective date	Update
Table of Contents	
Revised page numbers.	Update
Rule 402(a)	Clarification
Revised Rule 402(a) to clarify the timeframe and type of event where a Participant needs to provide Required Notice to the Company.	
Rule 526(e)	Core Principle 2
Amended Rule to allow parties amending or cancelling a trade without preapproval by the Company and requiring notification solely from the Reporting Counterparty.	
Rule 527(a)	Update
Fixed a typo to read Rule 527 instead of Rule 528	
Rule 527(e)	Clarification
Amended Rule to clarify that the Company limitation of liability does not extend to fraud, gross negligence or willful misconduct.	