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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 November 27th, 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 May 1st, 2020 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 regulatory 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 May 1, 2020 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. No changes have been made to the User Guide for 360TGTX but for reference it is attached as Exhibit H.

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> Updated Rule and page numbers as a new rule was added.	Update
<u>Rule 527</u> Added Rule 527 (Post-Trade Name Give-Up) to clearly indicate that it is a violation of the Rulebook for a person to disclose the identity of a counterparty to a swap executed anonymously and intended to be cleared.	CFTC Rule 37.9(d)
<u>User Guide Market Taker Cover Page</u> Updated date	Update
<u>User Guide Market Taker Section 7</u> Updated contact information for Asia Pacific	Update
<u>User Guide Market Maker Cover Page</u> Updated date	Update
<u>User Guide Market Maker Section 7</u> Updated contact information for Asia Pacific	Update