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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 December 15, 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 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 August 24, 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 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 August 24, 2017 is attached hereto as Exhibit C. 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 Exhibit D 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> Revised title of Rule 517	Update
<u>Rule 101</u> Revised the definition for Authorized User	Update
<u>Rule 311(b)</u> Amended language to clarify the timeframe in regards to Withdrawal of a Participant.	Clarification
<u>Rule 401(a)(8)</u> Added language specify the books and records requirements apply to the Company's Trading System.	Clarification
<u>Rule 402(a)(2)</u> Added the word involuntary to specify what types of withdrawal require a notice.	Clarification
<u>Rule 403</u> Added language to specify what type of data is stored by the Company and may be inspected.	Clarification
<u>Rule 404(a)</u> Amended language to clarify the timeframe of Participant's requirement to provide a regulatory capital report.	Clarification
<u>Rule 503</u> Amended language to clarify what acts are considered detrimental under Rule 503.	Clarification

<u>Rule 504</u> Added the words “or other” to specify what transactions are covered under Rule 504.	Clarification
<u>Rule 506</u> Amended language to say market disruptions instead of defining market disruption.	Clarification
<u>Rule 512</u> Removed word “electronically” to specify how a client must record the time of a Customer Order.	Clarification
<u>Rule 513(a)</u> Changed the language from Person to individual	Clarification
<u>Rule 513(b)</u> Changed the language from Person to individual	Clarification
<u>Rule 515(b)</u> Changed the language from Person to individual	Clarification
<u>Rule 517(b)</u> Removed Pre-Negotiated from what transactions are prohibited.	Update
<u>Rule 526(c)(5)</u> Added language to specify the Company maintains sole discretion to cancel or adjust a trade	Clarification
<u>Rule 527</u> Removed word “Finally” as the adverb isn’t needed	Update
<u>Rule 903(c)</u> Added language to specify what data is on the Company’s Trading System	Clarification
<u>Rule 904(b)(i)</u> Added language to specify what Participant data is in-scope for Rule 906.	Clarification
<u>Rule 909</u> Added language to specify what Swaps would be in-scope for an amendment, repeal or new rule.	Clarification
<u>Rule 912(b)</u> Added language “in connection with the applicable Derivative Clearing Organization” to part (4), (5) and (6) to specify who would be carrying out these functions.	Clarification