

Citigroup Global Markets Inc.
388 Greenwich Street
New York, NY 10013
United States of America

VIA EDGAR

December 11, 2018

Ms. Lory Empie
Ms. Cara Lubit
Mr. Christopher Dunham
Mr. Michael Clampitt
Division of Corporation Finance
Office of Financial Services
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, D.C., 20549

Re: 360 Finance, Inc. (CIK No. 0001741530)
Registration Statement on Form F-1, as amended (File No. 333-228020)

Ladies and Gentlemen:

We hereby join 360 Finance, Inc. (the "Company") in connection with its request for acceleration of the above-referenced Registration Statement, requesting effectiveness at 4:30 p.m., Eastern Time, on December 13, 2018, or as soon thereafter as practicable.

Pursuant to Rule 460 of the General Rules and Regulations promulgated under the Securities Act of 1933, as amended, we wish to advise you that, through the date hereof, 90 copies of the Company's preliminary prospectus dated December 6, 2018 were distributed to prospective underwriters, institutional investors, dealers and others.

The undersigned advise that the underwriters have complied and will continue to comply with Rule 15c2-8 under the Securities Exchange Act of 1934, as amended.

[Signature pages follow]

Very truly yours,

As the representative of the
several underwriters

**CITIGROUP GLOBAL
MARKETS INC.**

By: /s/ Lydia Liu
Name: Lydia Liu
Title: Managing Director

[Signature Page to Issuer Acceleration Request]
