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REGISTERED FOREIGN LAWYER

Z. JULIE GAO (CALIFORNIA)

December 11, 2018

**VIA EDGAR**

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. No. 0001741530)**  
**Amendment No. 3 to Registration Statement on Form F-1**

Dear Ms. Empie, Ms. Lubit, Mr. Dunham and Mr. Clampitt:

On behalf of our client, 360 Finance, Inc., a foreign private issuer organized under the laws of the Cayman Islands (the “**Company**”), we are filing herewith the Company’s Amendment No. 3 to registration statement on Form F-1 (the “**Registration Statement**”) via EDGAR with the Securities and Exchange Commission (the “**Commission**”). To facilitate your review, we have separately delivered to you today five courtesy copies of the Registration Statement, marked to show changes to the registration statement publicly filed to the Commission on December 6, 2018.

The Company has submitted acceleration requests concurrently with the filing of the Registration Statement. The Company would appreciate the Staff’s timely assistance and support to the Company in meeting the proposed timetable for the offering.

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If you have any questions regarding the Registration Statement, please contact the undersigned by phone at +852 3740-4891 or via e-mail at will.cai@skadden.com, or Kevin Lin, partner at Deloitte Touche Tohmatsu Certified Public Accountants LLP, by telephone at +86 21 6141-2196 or via email at kelin@deloitte.com.cn. Deloitte Touche Tohmatsu Certified Public Accountants LLP is the independent registered public accounting firm of the Company.

Very truly yours,

/s/ Will H. Cai

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Enclosures.

cc: Jun Xu, Chief Executive Officer, 360 Finance, Inc.  
Jiang Wu, Chief Financial Officer, 360 Finance, Inc.  
Peter X. Huang, Esq., Partner, Skadden, Arps. Slate, Meagher & Flom LLP  
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