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November 6, 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. 1 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.1 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 October 26, 2018.

The Company plans to file an amendment to the Registration Statement containing the estimated price range and offering size on or about November 21, 2018 and launch the road show on November 22, 2018. The Company would appreciate the Staff’s timely assistance and support to the Company in meeting the proposed timetable for the offering.

* * *

If you have any questions regarding the Draft 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

Will H. Cai

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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