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July 16, 2004

VIA EMAIL: secretary@cftc.gov

Ms. Jean A. Webb
Secretary of the Commission
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**RE: Self-Certification filing amending HedgeStreet Rule 1.1(d), 3.1(a),(b),
4.1(a), 4.3(a), 4.6(a) and 6.3**

Dear Secretary Webb:

In accordance with Commission Regulation 40.6(a)(2) and (3), HedgeStreet, Inc. ("HedgeStreet") hereby files with the Commission the amendments described below with the text of the rules stated in Exhibit A. The rule deletions are stricken out and the amendments or additions are underlined. HedgeStreet intends to implement these amendments on July 19, 2004. No substantive opposing views were expressed to HedgeStreet with respect to these amendments. HedgeStreet hereby certifies that HedgeStreet's Rules, as amended by these amendments, comply with the Commodity Exchange Act, as amended, and the Commission's regulations adopted thereunder.

DESCRIPTION OF AMENDMENTS

Rule 1.1(d)

HedgeStreet has added this definition in order to clarify the types of financial institutions that members may use to fund their accounts. The rule changes are intended to allow members to fund their accounts from United States financial institutions that are currently required to comply with the regulations issued by the United States Department of Treasury under the Bank Secrecy Act, including, but not limited to, the anti-money laundering and customer identification program rules.

Rule 3.1(a)(b), 4.1(a), 4.3(a), 4.6(a) and 6.3

HedgeStreet has amended these rules to reflect the addition of the definition in Rule 1.1(d).



HedgeStreet has also amended Rule 6.3 in order to direct members to HedgeStreet's website in order to find all applicable fees relating to maintaining an account at HedgeStreet.



EXHIBIT A

RULE 1.1 DEFINITIONS

(a) – (c) [unchanged]

(d) **“Financial Institution”** means a financial institution as that term is defined in 31 CFR 103.11(n) that is required to comply with the regulations issued by the United States Department of Treasury under the Bank Secrecy Act including, but not limited to, the anti-money laundering program and customer identification program rules.

(d) - (r) [renumbered as (e) – (s), but otherwise unchanged]

RULE 3.1 APPLICATIONS, CLASSIFICATIONS, AND PRIVILEGES

(a) To be eligible to become a HedgeStreet Member:

(i) if you are an individual, you must reside in the United States and have an account or accounts with a ~~United States Financial Institution, subject to all of the requirements of the Bank Secrecy Act (“BSA”)~~, that you will use to fund your HedgeStreet account at the HedgeStreet settlement bank and to receive funds from your HedgeStreet account, and you must certify that you are old enough to enter into a legally enforceable contract, that you have read and understand the HedgeStreet Risk Disclosure Statement and Membership Agreement, that you agree to be bound by these Rules, and that you will trade only for yourself and will not trade as an intermediary for any other person or entity;

(ii) if you are an entity, you must be organized in the United States, have an account or accounts with a ~~Financial Institution, subject to all of the requirements of the BSA~~, that you will use to fund your HedgeStreet account at the HedgeStreet settlement bank and to receive funds from your HedgeStreet account, and you must certify that you are validly organized, in good standing, and authorized by your governing body and, if relevant, documents of organization, to trade commodities, futures and options contracts, that you have read and understand the HedgeStreet Risk Disclosure Statement and Membership Agreement, that you agree to be bound by these Rules, and that the individual authorized to trade your account will trade only for you and will not trade for him/herself or as an intermediary for any other entity or person.



(b) In order to become a Member, you must complete and submit the HedgeStreet on-line membership application, provide HedgeStreet with any other information HedgeStreet may request, and fund your HedgeStreet account by transferring to the customer segregated funds account at HedgeStreet's settlement bank an initial deposit of no less than \$500 in funds from your account at a ~~Financial Institution located in the U.S. and subject to all BSA requirements~~. If you are a Member applicant but not an individual, you must designate an individual who is authorized to trade in your account.

RULE 4.1 REGISTRATION OF MARKET MAKERS

(a) In order to become a Market Maker you must already be a Member of HedgeStreet in good standing. A Member shall file a written Market Maker application with HedgeStreet and submit with its application, verification that a line of credit has been established with a ~~United States Financial Institution that is subject to all of the requirements of the Bank Secrecy Act ("BSA")~~. HedgeStreet shall consider such factors as business reputation, financial resources and trading activity in relevant futures, options or related cash markets in determining whether to approve a Market Maker application.

RULE 4.3 APPOINTMENT OF MARKET MAKERS

(a) HedgeStreet shall appoint Market Makers to certain Classes of Contracts ("Designated Classes") traded on HedgeStreet. In making such appointments, HedgeStreet shall consider (i) the financial resources available to the Market Maker, including a line of credit established with a ~~United States Financial Institution subject to all of the BSA requirements~~, and (ii) the Market Maker's experience in market making in futures, options and other derivative products.

RULE 4.6 LINE OF CREDIT

(a) No Market Maker shall effect any transaction as a Market Maker on HedgeStreet unless a line of credit of not less than \$1,000,000 has been established by such Market Maker at a ~~United States Financial Institution subject to all BSA requirements~~ and, approved by HedgeStreet for the purpose of establishing an immediate source of funding for the Market Maker's account at HedgeStreet in order to finance its trading in that account. (Like other Members of HedgeStreet, a Market Maker may not place an order unless it has the funds in its HedgeStreet account necessary to fulfill its obligations under that order.)