



August 2, 2004

VIA EMAIL: [secretary@cftc.gov](mailto: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

2004 AUG -3 AM 8:27  
RECEIVED  
C.F.T.C.

**RE: Self-Certification filing amending HedgeStreet Rule 12.3(h), 12.4(h), 12.5(h), 12.6(h), 12.7(h), 12.8(h), 12.9(h), 12.19(h), 12.20(h)**

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 August 3, 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 12.3(h), 12.4(h), 12.5(h), 12.6(h), 12.7(h), 12.8(h), 12.9(h), 12.19(h), 12.20(h)**

HedgeStreet has changed these rules to increase the reporting levels of certain HedgeStreet cash settled binary option contracts to 125,000 in reliance upon the Commission's grant of No-Action relief dated July 26, 2004.

Should you have any questions regarding the above, please do not hesitate to contact me.

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance



## EXHIBIT A

### RULE 12.3 CURRENCY EXCHANGE EUR/USD CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL - The Reporting Level for the EUR/USD Hedgelet Contracts shall be ~~400~~ 125,000 contracts.

(i) – (o) [unchanged]

### RULE 12.4 CURRENCY EXCHANGE GBP/USD CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL - The Reporting Level for the GBP/USD Hedgelet Contracts shall be ~~400~~ 125,000 contracts.

(i) – (o) [unchanged]

### RULE 12.5 CURRENCY EXCHANGE USD/YEN CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL - The Reporting Level for the USD/YEN Hedgelet Contracts shall be ~~400~~ 125,000 contracts.

(i) – (o) [unchanged]

### RULE 12.6 CURRENCY EXCHANGE USD/CHF CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL - The Reporting Level for the USD/CHF Hedgelet Contracts shall be ~~400~~ 125,000 contracts.

(i) – (o) [unchanged]

### RULE 12.7 FEDERAL FUNDS RATE CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL - The Reporting Level for Federal Funds Rate Hedgelet Contracts shall be ~~300~~ 125,000 contracts.



(i) – (o) [unchanged]

**RULE 12.8 GASOLINE CONTRACTS**

(a) – (g) [unchanged]

(h) REPORTING LEVEL - The Reporting Level for the Gasoline Hedgelet Contracts shall be ~~150~~ 125,000 contracts.

(i) – (o) [unchanged]

**RULE 12.9 GOLD CONTRACTS**

(a) – (g) [unchanged]

(h) REPORTING LEVEL - The Reporting Level for the Gold Hedgelet Contracts shall be ~~200~~ 125,000 contracts.

(i) – (o) [unchanged]

**RULE 12.10 – 12.18 [unchanged]**

**RULE 12.19 MORTGAGE RATE (1 YEAR ARMS) CONTRACTS**

(a) – (g) [unchanged]

(h) REPORTING LEVEL - The Reporting Level for the Mortgage Rate 1-Year ARM Hedgelets shall be ~~25~~ 125,000 contracts.

(i) – (o) [unchanged]

**RULE 12.20 MORTGAGE RATE (30 YEAR FRMS) CONTRACTS**

(a) – (g) [unchanged]

(a) The Reporting Level for the Mortgage Rate 30-Year FRM Hedgelets shall be ~~25~~ 125,000 contracts.

**RULE 12.21 – 12.23 [unchanged]**

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