



January 7, 2005

Ms. Jean A. Webb  
Office of the Secretariat  
Commodity Futures Trading Commission  
Three Lafayette Center  
1155 21<sup>st</sup> Street, NW  
Washington, DC 20581

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C.F.T.C.

**RE: Junior Market Maker Program – Amendment to Contracts Deemed Eligible**

Dear Secretary Webb:

Pursuant to Commission Regulation 40.6(a), HedgeStreet, Inc. (“HedgeStreet”), a designated contract market (“DCM”) and derivatives clearing organization (“DCO”), is submitting to the Commission an amendment to the HedgeStreet Junior Market Maker Program (“Program”), previously submitted on January 5, 2005. This amendment updates the list of eligible contracts for this Program to include all contracts currently issued on HedgeStreet as well as any contracts HedgeStreet may issue in the future in order to create greater liquidity in those new markets. All requirements and incentives for this Program remain the same. Any additional changes to the requirements or incentives of this program will be submitted to the Commission under separate cover prior to implementation of the change pursuant to Commission Regulation 40.6.

**The Program**

As a fully electronic, non-intermediated, retail-based contract market, HedgeStreet is primarily focused on the retail investor and optimizing his/her trading experience by enhancing the amount of liquidity available on its market. Therefore, HedgeStreet has developed this Program to educate the general public about its products as well as to create greater liquidity in certain instruments that trade on HedgeStreet.

The Program’s incentives allow participants to trade on HedgeStreet without incurring any trading fees or settlement fees. In return, the participants will maintain continuous two-sided markets for at least thirty percent (30%) of the time that the specific market is open for trading during a given month.

Although dependent upon each market, the minimum contract size for each side of each market shall be at least 10 contracts. The Program will be in effect for three (3) months, from the time an agreement is executed by a participating Market Maker.



**Regulatory Issues**

HedgeStreet hereby certifies that the Program complies with the Commodity Exchange Act, as amended, and the Commissions regulations adopted thereunder.

Should you have any questions or require additional information, please do not hesitate to contact the undersigned at (650) 638-3511 or [sford@hedgestreet.com](mailto:sford@hedgestreet.com).

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance