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January 28, 2005

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: HedgeStreet Promotional Offer

Dear Secretary Webb:

HedgeStreet, Inc. ("HedgeStreet"), a designated contract market ("DCM") and derivatives clearing organization ("DCO"), is planning to initiate a Special Free Trade Promotional Offer (the "Promotion"). The Promotion allows members who fund a HedgeStreet account for the first time, to trade without incurring any trading fees for a period of 30 calendar days (to commence upon the time that the member's funds have settled into their account and such funds are deemed available for use towards trade). The Promotion is available only to HedgeStreet members who initially fund an account from January 31, 2005 through the end of business on March 31, 2005 ("Promotion Period"). Settlement fees will still apply and members with existing funded accounts are not eligible to participate in this Promotion. All trades deemed free of charge must be executed within the first thirty (30) calendar days of the initial funds deposit to a HedgeStreet account. Rebates and/or credits do not apply and they will not be issued to member participants.

The following chart summarizes the eligibility requirements for the Promotion.

Type Of Member	Eligibility To Participate In Promotion
New Member opens an account and funds it during Promotion Period	Yes
Existing Member funds account for first time during Promotion Period	Yes
Existing Member funded account prior to Promotion Period	No

The purpose of this letter is to notify the Commission of HedgeStreet's intention to initiate the Promotion on Tuesday, February 1, 2005.



The Promotion

As a fully electronic, non-intermediated, retail-based contract market, HedgeStreet is primarily focused on the retail investor and optimizing his/her trading experience as an exchange member. By providing an incentive for members to trade, HedgeStreet continues to implement ways of increasing market liquidity while gaining new market data in the products currently offered on the exchange.

There is a limit of one (1) member participant per household.

Regulatory Issues

HedgeStreet hereby certifies that the Promotion 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.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance