



**HEDGE  
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OFC. OF THE SECRETARIAT

May 5, 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

RE: Certification: HedgeStreet Changes and Defines the name of a Series of Currency Exchange Contracts and the Silver Contract from "Spot" Contracts to "Daily" Contracts

Dear Secretary Webb:

In accordance with Commission Regulation 40.6, HedgeStreet, Inc. ("HedgeStreet") hereby files with the Commission a change in the name of a Series of Currency Exchange Fixed Payout Hedgelet Contracts as well as the Silver Fixed Payout Hedgelet Contract (from "Spot" Contract to "Daily" Contract) including the addition of the relevant definition of "Daily" Contract. The following Rules are affected:

- Rule 12.1(e) – addition of definition to *Daily Contract*; and
- Rules 12.4(i), 12.5(i), 12.6(i), 12.7(i), 12.29(i) – which are the Rules representing the Currency Exchange EUR/USD, GBP/USD, USD/YEN, USD/CHF Fixed Payout Contracts, and Silver Fixed Payout Hedgelet Contracts, respectively.

The amendments to the aforementioned terms and conditions of these Contracts are defined in Exhibit A in accordance with Commission Regulation 40.6. The rule deletions are stricken out and the amendments or additions are underlined. HedgeStreet intends to issue these Rule changes on Friday May 6, 2005.

No substantive opposing views were expressed to HedgeStreet with respect to these additions and amendments.

HedgeStreet hereby certifies that the Contracts and the clearing of the Contracts, including all rules defining the terms and conditions of said Contracts contained herein, complies with the Act and the Commission Regulations adopted thereunder.

Should you have any questions, please contact the undersigned at [sford@hedgestreet.com](mailto:sford@hedgestreet.com) or (650) 638-3511.

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance



**EXHIBIT A**

RULE 12.1 TERMS THAT ARE UNIFORM ACROSS CONTRACTS

(a) – (d) [unchanged]

(e) DAILY CONTRACTS means a Series of Contracts that have a Payout Criterion based on the last reported level of the Underlying by the Source Agency and have an Expiration Date on the same day that they are issued.

(f) – (m) [except for renumbering these rules are unchanged]

RULE 12.1 – 12.3 [unchanged]

RULE 12.4 CURRENCY EXCHANGE EUR/USD CONTRACTS

(a) – (f) [unchanged]

(i) SPOT DAILY EUR/USD CONTRACTS

(ii) – (v) [unchanged]

(g) – (o) [unchanged]

RULE 12.5 CURRENCY EXCHANGE GBP/USD CONTRACTS

(a) – (f) [unchanged]

(i) SPOT DAILY GBP/USD CONTRACTS

(ii) – (v) [unchanged]

(g) – (o) [unchanged]

RULE 12.6 CURRENCY EXCHANGE USD/YEN CONTRACTS

(a) – (f) [unchanged]

(i) SPOT DAILY USD/YEN CONTRACTS

(ii) – (v) [unchanged]

(g) – (o) [unchanged]

RULE 12.7 CURRENCY EXCHANGE USD/CHF CONTRACTS



(a) – (f) [unchanged]

(i) SPOT DAILY USD/CHF CONTRACTS

(ii) – (v) [unchanged]

(g) – (o) [unchanged]

RULE 12.8 – 12.28 [unchanged]

RULE 12.29 SILVER CONTRACTS

(a) – (f) [unchanged]

(i) SPOT DAILY SILVER CONTRACTS

(ii) [unchanged]

(g) – (o) [unchanged]

RULE 12.30 – 12.49 [unchanged]