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May 13, 2005

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

RE: Certification: HedgeStreet Changes the name of a Silver Contract from "Daily" Contracts to "Spot" 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 Silver Fixed Payout Hedgelet Contract (from "Daily" Contract to "Spot" Contract), solely represented by Rule 12.29(f)(i).

The amendment to the aforementioned terms and conditions of this Contract is 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 Monday, May 16, 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 or (650) 638-3511.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance



EXHIBIT A

RULE 12.29 SILVER CONTRACTS

(a) – (e) [unchanged]

(f) PAYOUT CRITERION – The two Contracts in each of the Hedgelet Pairs will have Payout Criteria which are mutually exclusive of each other, while being collectively exhaustive. The Payout Criterion for each Contract in the Hedgelet Pair will be set by HedgeStreet at the time the Hedgelet Pairs are initially issued. For the Hedgelet Pairs, the Payout Criteria of the Contracts in the Pair will be set as follows;

(i) DAILY-SPOT SILVER CONTRACTS

(ii) [unchanged]

(g) – (o) [unchanged]