HEDGE Street.

January 30, 2006

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: **Certification: HedgeStreet Temporarily Delisting Certain Monthly
      Contracts and adding New Weekly Contracts - Submission pursuant to
      Commission Regulation §40.6**

Dear Secretary Webb:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended ("Act"), and
§40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission
(the "Commission") under the Act, HedgeStreet, Inc. ("HedgeStreet") hereby submits to
the Commission its intent to temporarily delist certain monthly contracts in order to list
weekly contracts of the same Class.

Delisting of Monthly Contracts

HedgeStreet intends to delist the following Classes of Monthly Contracts until a later date
in the future.

HEDGESTREET RULE ID	TYPE	UNDERLYING	SETTLEMENT DATE
12.67	Binary Contract	Mortgage Rate (30- Year FRM)	January 26, 2006
12.30	Variable Contract	Currency Exchange EUR/USD	January 31, 2006
12.31	Variable Contract	Currency Exchange GBP/USD	January 31, 2006
12.32	Variable Contract	Currency Exchange USD/YEN	January 31, 2006
12.33	Variable Contract	Currency Exchange USD/CHF	January 31, 2006
12.34	Variable Contract	Gasoline	January 30, 2006
12.35	Variable Contract	Gold	January 31, 2006
12.36	Variable Contract	Crude Oil	January 31, 2006
12.37	Variable Contract	Silver	January 31, 2006
12.51	Variable Contract	Natural Gas	January 31, 2006

www.hedgestreet.com

1825 S. Grant Street
Suite 500
San Mateo, CA 94402
Tel: 650.638.3500
Fax: 650.638.3501

Listing of New Weekly Instruments

HedgeStreet will be listing new weekly contracts in accordance with the following listing schedule and the rules added in Exhibit A. Since the following Weekly Contracts will commence trading in the middle of the week, the listing cycle for such Contracts during the week of January 30, 2006 will be shortened. Commencing on Monday, February 6, 2006, all Weekly Contracts will commence trading in accordance with HedgeStreet Rules.

HEDGESTREET RULE #	TYPE	UNDERLYING	LISTING CYCLE FOR WEEK OF 1/30/06
12.67	Binary Contract	Mortgage Rate (30- Year FRM)	Commence trading on 1/31/06 and expire on 2/2/06. Contract to be re-listed in accordance with HedgeStreet Rules on 2/3/06.
12.30	Variable Contract	Currency Exchange EUR/USD	Commence trading on 2/1/06 and expire on 2/3/06. Contract to be re-listed on 2/6/06 in accordance with HedgeStreet Rules on 2/6/06.
12.31	Variable Contract	Currency Exchange GBP/USD	Commence trading on 2/1/06 and expire on 2/3/06. Contract to be re-listed on 2/6/06 in accordance with HedgeStreet Rules on 2/6/06.
12.32	Variable Contract	Currency Exchange USD/YEN	Commence trading on 2/1/06 and expire on 2/3/06. Contract to be re-listed on 2/6/06 in accordance with HedgeStreet Rules on 2/6/06.
12.33	Variable Contract	Currency Exchange USD/CHF	Commence trading on 2/1/06 and expire on 2/3/06. Contract to be re-listed on 2/6/06 in accordance with HedgeStreet Rules on 2/6/06.
12.34	Variable Contract	Gasoline	Commence trading on 1/31/06 and expire on 2/6/06 and therefore, has a listing cycle in accordance with HedgeStreet Rules.
12.35	Variable Contract	Gold	Commence trading on 2/1/06 and expire on 2/3/06. Contract to be re-listed in on 2/6/06 accordance with HedgeStreet Rules on 2/6/06.
12.36	Variable Contract	Crude Oil	Commence trading on 2/1/06 and expire on 2/3/06. Contract to be re-listed in on 2/6/06 accordance with HedgeStreet Rules on 2/6/06.
12.37	Variable Contract	Silver	Commence trading on 2/1/06 and expire on 2/3/06. Contract to be re-listed in on 2/6/06 accordance with HedgeStreet Rules on 2/6/06.
12.51	Variable Contract	Natural Gas	Commence trading on 2/1/06 and expire on 2/3/06. Contract to be re-listed in on 2/6/06 accordance with HedgeStreet Rules on 2/6/06.

www.hedgestreet.com

1825 S. Grant Street
Suite 500
San Mateo, CA 94402
Tel: 650.638.3500
Fax: 650.638.3501

HEDGE Street.

HedgeStreet intends to make these amendments effective as of January 31, 2006.

No contracts that have open interest will be affected by these amendments.

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

HedgeStreet certifies that such action complies with the requirements of the Act and the rules and regulations promulgated thereunder.

Should you have any questions regarding the above, please do not hesitate to contact Stephanie Ford by telephone at (650) 638-3511 or by email at sford@hedgestreet.com.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

cc: Tom Leahy – CFTC
        Phil Colling – CFTC
        Clarissa Manansala – HedgeStreet, Inc.

www.hedgestreet.com

1825 S. Grant Street
Suite 500
San Mateo, CA 94402
Tel: 650.638.3500
Fax: 650.638.3501

HEDGE Street.

EXHIBIT A
(Rule additions are underlined and rule deletions are stricken out.)

RULE 12.30 CURRENCY EXCHANGE EUR/USD VARIABLE PAYOUT CONTRACTS

        (a) - (e) [unchanged]

        (f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

        (i) WEEKLY VARIABLE EUR/USD CONTRACT

        (1) CAP - The Cap shall be X + 0.05

        (2) FLOOR - The Floor shall be X - 0.05

        (3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 1000.

        (4) In each case, "X" equals the last EUR/USD price, rounded to the nearest 0.01, as reported in the EUR/USD foreign currency market at 5PM ET on the previous business day before the Weekly Variable EUR/USD Contract is listed for trading on HedgeStreet.

        (i) (ii) [except for renumbering, this rule is unchanged]

        (ii) (iii) [except for renumbering, these rules are unchanged]

        (g) - (o) [unchanged]

RULE 12.31 CURRENCY EXCHANGE GBP/USD VARIABLE PAYOUT CONTRACTS

        (a) - (e) [unchanged]

        (f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY VARIABLE GBP/USD CONTRACT

(1) CAP - The Cap shall be X + 0.05

(2) FLOOR - The Floor shall be X - 0.05

(3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 500.

(4) In each case, "X" equals the last GBP/USD price, rounded to the nearest 0.01, as reported in the GBP/USD foreign currency market at 5PM ET on the previous business day before the Weekly Variable GBP/USD Contract is listed for trading on HedgeStreet.

(i) (ii) [except for renumbering, this rule is unchanged]

(ii) (iii) [except for renumbering, these rules are unchanged]

(g) - (o) [unchanged]

RULE 12.32 CURRENCY EXCHANGE USD/YEN VARIABLE PAYOUT CONTRACTS

(a) - (c) [unchanged]

(f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY VARIABLE USD/YEN CONTRACT

(1) CAP - The Cap shall be X + 5

(2) FLOOR - The Floor shall be X - 5

(3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 5.

(4) In each case, "X" equals the last USD/YEN price rounded to the nearest 1, as reported in the USD/YEN foreign currency market at 5PM ET on the previous business day before the Weekly Variable USD/YEN Contract is listed for trading on HedgeStreet.

(i) (ii) [except for renumbering, this rule is unchanged]

(ii) (iii) [except for renumbering, these rules are unchanged]

www.hedgestreet.com

1825 S. Grant Street
Suite 500
San Mateo, CA 94402
Tel: 650.638.3500
Fax: 650.638.3501

(g) - (o) [unchanged]

RULE 12.33 CURRENCY EXCHANGE USD/CHF VARIABLE PAYOUT CONTRACTS

(a) - (e) [unchanged]

(f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY VARIABLE USD/CHF CONTRACT

(1) CAP - The Cap shall be X + .05

(2) FLOOR - The Floor shall be X - .05

(3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 500.

(4) In each case, "X" equals the last USD/CHF price, rounded to the nearest 0.01, as reported in the USD/CHF foreign currency market at 5PM ET on the previous business day before the Weekly Variable USD/CHF Contract is listed for trading on HedgeStreet.

(i) (ii) [except for renumbering, this rule is unchanged]

(ii) (iii) [except for renumbering, these rules are unchanged]

(g) - (o) [unchanged]

RULE 12.34 GASOLINE VARIABLE PAYOUT CONTRACTS

(a) - (e) [unchanged]

(f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY VARIABLE GASOLINE CONTRACT

(1) CAP - The Cap shall be X + $0.25

(2) FLOOR - The Floor shall be X - $0.25

www.hedgestreet.com

1825 S. Grant Street
Suite 500
San Mateo, CA 94402
Tel: 650.638.3500
Fax: 650.638.3501

(3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 100.

(4) In each case, "X" equals the last Gasoline price, rounded to the nearest five cents ($0.05), as reported by the Source Agency.

(i) (ii) [except for renumbering, this rule is unchanged]

(ii) (iii) [except for renumbering, this rule is unchanged]

(iii) (iv) [except for renumbering, this rule is unchanged.]

(iv) (v) [except for renumbering, this rule is unchanged.

(g) - (o) [unchanged]

RULE 12.35 GOLD VARIABLE PAYOUT CONTRACTS

(a) - (e) [unchanged]

(f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY VARIABLE GOLD CONTRACT

(1) CAP - The Cap shall be X + $25

(2) FLOOR - The Floor shall be X - $25

(3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 1.

(4) In each case, "X" equals the last Expiration Value for Gold, rounded to the nearest five dollars ($5.00), as reported by the Source Agency.

(i) (ii) [except for renumbering, this rule is unchanged]

(ii) (iii) [except for renumbering, these rules are unchanged]

(g) - (o) [unchanged]

RULE 12.36 CRUDE OIL VARIABLE PAYOUT CONTRACTS

(a) - (e) [unchanged]

www.hedgestreet.com

1825 S. Grant Street
Suite 500
San Mateo, CA 94402
Tel: 650.638.3500
Fax: 650.638.3501

(f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY VARIABLE CRUDE OIL CONTRACT

(1) CAP - The Cap shall be X + $15.

(2) FLOOR - The Floor shall be X - $15.

(3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 1.

(4) In each case, "X" equals the last reported Expiration Value of Crude Oil, rounded to the nearest dollar ($1.00), as reported by the Source Agency.

(i) (ii) MONTHLY VARIABLE CRUDE OIL CONTRACT

(1) - (3) [unchanged]

(4) In each case, "Z" equals the last Expiration Value of Crude Oil, rounded to the nearest dollar ($1.00), as reported by the Source Agency.

(ii) (iii) QUARTERLY VARIABLE PAYOUT CRUDE OIL CONTRACT

(1) - (3) [unchanged]

(4) In each case, "ZZ" equals the last Expiration Value of Crude Oil as reported by the Source Agency.

(iii) (iv) YEAR-END VARIABLE PAYOUT CRUDE OIL CONTRACT

(1) - (3) [unchanged]

(4) In each case, "A" equals the last Expiration Value of Crude Oil, as reported by the Source Agency.

(iv) (v) [except for renumbering, this rule is unchanged]

RULE 12.37 SILVER VARIABLE PAYOUT CONTRACTS

(a) - (e) [unchanged]

www.hedgestreet.com

1825 S. Grant Street
Suite 500
San Mateo, CA 94402
Tel: 650.638.3500
Fax: 650.638.3501

(f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY VARIABLE SILVER CONTRACT

(1) CAP - The Cap shall be X + 25.

(2) FLOOR - The Floor shall be X - 25.

(3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 1.

(4) In each case, "X" equals the last reported Expiration Value of Silver, rounded to the nearest five cents (5), as reported by the Source Agency.

(i) (ii) MONTHLY VARIABLE SILVER CONTRACT

(1) - (3) [unchanged]

(4) In each case, "Z" equals the last Expiration Value of Silver, rounded to the nearest five cents (5), as reported by the Source Agency.

(ii) (iii) [except for renumbering, this rule is unchanged]

RULE 12.38 – RULE 12.50   [unchanged]

RULE 12.51 NATURAL GAS VARIABLE PAYOUT CONTRACTS

(a) - (e) [unchanged]

(f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Variable Payout Contracts are initially issued. For the Variable Payout Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY VARIABLE NATURAL GAS CONTRACT

(1) CAP - The Cap shall be X + $2.00.

(2) FLOOR - The Floor shall be X - $2.00.

(3) DOLLAR MULTIPLIER - The Dollar Multiplier shall be 10.

HEDGE Street.

(4) In each case, "X" equals the last reported level Expiration Value of Natural Gas, rounded to the nearest fifty cents ($.50), as reported by the Source Agency.

~~(i)~~ (ii) [except for renumbering, this rule is unchanged.]

~~(ii)~~ (iii) [except for renumbering, this rule is unchanged.]

(g) - (o) [unchanged]

RULE 12.52 – RULE 12.66   [unchanged]

RULE 12.67 MORTGAGE RATE (30 YEAR FRMS) BINARY HEDGELET CONTRACTS

(a) - (e) [unchanged]

(f) PAYOUT CRITERION - The Payout Criterion for each Contract will be set by HedgeStreet at the time the Binary Contracts are initially issued. For the 30-Year FRM Binary Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows;

(i) WEEKLY 30-YEAR FRMS BINARY HEDGELET CONTRACT

(1) Binary Hedgelet Contract 1: One Contract will have a Payout Criterion of greater than Y - 0.06%.

(2) Binary Hedgelet Contract 2: One Contract will have a Payout Criterion of greater than Y - 0.03%.

(3) Binary Hedgelet Contract 3: One Contract will have a Payout Criteria of greater than Y.

(4) Binary Hedgelet Contract 4: One Contract will have a Payout Criterion greater than Y + 0.03%.

(5) Binary Hedgelet Contract 5: One Contract will have a Payout Criterion greater than Y + 0.06%.

(6) In each case, "Y" equals the last 30-Year FRM regularly scheduled release reported by the Source Agency.

~~(i)~~ (ii) [except for renumbering, this rule is unchanged.]

~~(ii)~~ (iii) [except for renumbering, this rule is unchanged.]

**HEDGE
Street.**

(g) – (o) [unchanged]

RULE 12.68 – RULE 12.78   [unchanged]

[the remainder of this page is intended to be blank]