



February 24, 2006

VIA EMAIL: [secretary@cftc.gov](mailto: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: Rule Certification: HedgeStreet® Temporarily Reduces the Reporting Levels and corresponding Speculative Position Limits for Crude Oil, Gold, Natural Gas, and Silver Binary Instruments; Amendments made pursuant to Section 5c(c)(1) and Part 40.6(a)**

Dear Secretary Webb:

HedgeStreet, Inc. ("HedgeStreet") hereby notifies the Commission that as of the start of business on Monday, February 27, 2006, HedgeStreet will temporarily effect a proportionate reduction in both the a) reporting levels; and b) speculative position limits for the Binary contracts referenced below, (as represented by their corresponding HedgeStreet Rules, also listed below):

Rule 12.59 Crude Oil Binary Hedgelet Contracts  
Rule 12.66 Gold Binary Hedgelet Contracts  
Rule 12.68 Natural Gas Binary Hedgelet Contracts  
Rule 12.70 Silver Binary Hedgelet Contracts

The amendments for these Contracts are defined in Exhibit A. The rule deletions are stricken out and the amendments and/or additions are underlined. No substantive opposing views were expressed to HedgeStreet with respect to these additions.

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](mailto:sford@hedgestreet.com).

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance

cc: Clarissa Manansala – HedgeStreet, Inc.



## EXHIBIT A

Amendment to Rules 12.59(i), 12.66(i), 12.68(i), and 12.70(i)  
(The following new Rule additions are underlined and deletions are stricken out)

RULES 12.1 – 12.58 [unchanged]

### RULE 12.59 CRUDE OIL BINARY HEDGELET CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL – The Reporting Level for the Crude Oil Binary Hedgelets shall be ~~125,000~~ 1,250 Contracts.

(i) POSITION LIMIT – The Position Limits for the Crude Oil Binary Hedgelets shall be ~~2.5 million~~ 25,000 Contracts.

(j) – (o) [unchanged]

RULES 12.60 – 12.65 [unchanged]

### RULE 12.66 GOLD BINARY HEDGELET CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL – The Reporting Level for the Gold Binary Hedgelets shall be ~~125,000~~ 417 Contracts.

(i) POSITION LIMIT – The Position Limits for the Gold Binary Hedgelets shall be ~~7.5 million~~ 25,000 Contracts.

(j) – (o) [unchanged]

RULE 12.67 [unchanged]

### RULE 12.68 NATURAL GAS BINARY HEDGELET CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL – The Reporting Level for the Natural Gas Binary Hedgelets shall be ~~125,000~~ 500 Contracts.



(i) POSITION LIMIT – The Position Limits for the Natural Gas Binary Hedgelets shall be ~~2.5 million~~ 10,000 Contracts.

(j) – (o) [unchanged]

RULE 12.69 [unchanged]

#### RULE 12.70 SILVER BINARY HEDGELET CONTRACTS

(a) – (g) [unchanged]

(h) REPORTING LEVEL – The Reporting Level for the Silver Binary Hedgelets shall be ~~125,000~~ 625 Contracts.

(i) POSITION LIMIT – The Position Limits for the Silver Binary Hedgelets shall be ~~4 million~~ 20,000 Contracts.

(j) – (o) [unchanged]

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