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OFFICE OF THE SECRETARIAL

October 5, 2006

VIA EMAIL: secretary@cftc.gov

Ms. Eileen A. Donovan, Acting Secretary
Secretary of the Commission
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: Rule Certification: HedgeStreet® Amends the Minimum Tick size for its Mortgage Rate (30-Year Fixed Rate Mortgage) Binary Contracts; Submission made pursuant to Commission Regulation §40.6(a)

Dear Acting Secretary Donovan:

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 certifies with the Commission its intent to increase the minimum tick size of the Mortgage Rate (30-Year Fixed Rate Mortgage) Binary Contracts from \$0.01 to \$0.50 ("Contracts").

HedgeStreet will first issue the Contracts with the amended Minimum Tick size on Friday, October 6, 2006. Since the current Contracts that have a Minimum Tick of \$.01 had a Last Trade Date of Wednesday, September 20, 2006, there will be no open interest in such Contracts upon the close of business on Thursday, October 5, 2006.

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 amendments.

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.



EXHIBIT A

Amendment to Rule 12.67 only

(The following new Rule additions are underlined and deletions are stricken out)

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

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for Mortgage Rate 30-Year FRM Binary Hedgelets shall be ~~\$0.01~~ \$0.50.

(h) – (o) [unchanged]

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