



February 27, 2007

VIA ELECTRONIC MAIL: secretary@cftc.gov

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

RE: Certification: HedgeStreet Implements a New Way for the HedgeStreet Trading System to Accept Orders from Market Makers – Submission pursuant to Commission Regulation §40.6(a) and Commission Regulation 145.9

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 implement a new way for the HedgeStreet Trading System to accept orders ("Quote") from market makers in order to enhance exchange performance which is further detailed below in Exhibit A.

There will be no impact to end-users due to the implementation of the enhancement described in Exhibit A. If an end-user places an order that matches with a Quote, the transaction will be maintained in the same manner that it is today.

HedgeStreet has discussed this change from Orders to Quotes for market makers with NFA. HedgeStreet has also sent test files to NFA to ensure that it received all required information in such files. NFA stated that no problems were encountered during its testing of the files as there were no changes to the files NFA has been receiving since HedgeStreet commenced trading activity. NFA noted that HedgeStreet's proposed changes will primarily effect how HedgeStreet stores Quotes during the trading session and will facilitate the user's order management. NFA stated that these changes will be entirely transparent to NFA since HedgeStreet will still report Quote activity in the same manner that HedgeStreet uses for regular Orders.

There will be no changes to any of the reports HedgeStreet currently sends to the Commission as a result of the Quotes implementation.

Please be advised that Exhibit A to this certification contains trade secrets or confidential commercial information of HedgeStreet. HedgeStreet has therefore petitioned for confidential treatment to be afforded to Exhibit A pursuant to Commission Regulation 145.9 until HedgeStreet notifies the Commission that HedgeStreet, Inc., no longer regards such information as confidential.

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HedgeStreet intends to implement the aforementioned amendments during the week commencing Monday, February 26, 2007.

There were no substantive opposing views expressed in approving these amendments.

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

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

cc: Clarissa Manansala – HedgeStreet, Inc.
Riva Adriance – Commodity Futures Trading Commission