



**HEDGE  
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OFFICE OF THE SECRETARIAT

March 7, 2007

VIA EMAIL: [secretary@cftc.gov](mailto: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 to Amend the Prices Used to Calculate the Expiration Value and Underlying for Gold, Silver, Crude Oil and Natural Gas Contracts**

Dear 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 that it intends to commence using a random sampling of NYMEX<sup>®1</sup> prices<sup>2</sup> executed through both pit trading as well as electronic trading by applying its proprietary algorithm to calculate the Expiration Values and Underlying for the following Binary and Variable Contracts:

- Gold
- Silver
- Crude Oil
- Natural Gas

HedgeStreet originally submitted the details of its proprietary algorithm to the Commission on January 3, 2005.

HedgeStreet will also be amending the footnote to all of the aforementioned contracts. All deletions are stricken out and the additions are underlined.

<sup>1</sup> NYMEX<sup>®</sup> is a registered service mark of the New York Mercantile Exchange, Inc. HedgeStreet, Inc. is not affiliated with the New York Mercantile Exchange, Inc. and neither the New York Mercantile Exchange, nor its affiliates, sponsor or endorse HedgeStreet, Inc. in any way.

<sup>2</sup> The term “Prices” does not include any settlement prices calculated or issued by NYMEX. HedgeStreet uses the prices reported during both the electronic and pit trading sessions executed just prior to the close of the pit trading session in order to formulate its own expiration value.



The term "Prices" does not include any settlement prices calculated or issued by NYMEX. HedgeStreet ~~only~~ uses the prices reported during both the electronic and pit trading sessions executed just prior to the close of the pit trading session in order to formulate its own expiration value. on the exchange during the last 30 minutes of trading in order to formulate its own settlement price

HedgeStreet intends to implement these rule amendments at the start of business on Thursday, March 8, 2007. No substantive opposing views were expressed to HedgeStreet with respect to these additions.

HedgeStreet hereby certifies that the Contracts and clearing of the Contracts, including all rules defining the terms and conditions of said Contracts contained herein, complies with the Act, as amended, and the Commission's regulations adopted 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](mailto:sford@hedgestreet.com).

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance

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