



June 25, 2007

VIA ELECTRONIC MAIL: secretary@cftc.gov

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

RE: Rule Certification: Amendments to the Payout Criteria for the Wal-Mart and Exxon/Mobil EPS Contracts

Dear Acting Secretary Donovan:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended ("Act") and §40.6 of the Regulation promulgated by the Commodity Futures Trading Commission (the "Commission") under the Act, HedgeStreet, Inc. ("HedgeStreet") hereby submits to the Commission HedgeStreet's intent to amend the Payout Criteria for the Wal-Mart and Exxon/Mobil EPS Contracts (collectively "Contracts"). The applicable rule amendments are found under Exhibit A with deletions stricken out and additions underlined.

The amendments to the Payout Criteria do not affect the Payout Criteria of those Contracts with open interest. The purpose of these amendments are to facilitate the listing of additional Series of Contracts in a consistent manner.

These rule amendments will go into effect at the start of business on Tuesday, June 26, 2007.

No substantive opposing views were expressed to HedgeStreet with respect to this Program.

Should you have any questions regarding this submission, 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 of Legal & Compliance

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



EXHIBIT A

Amendments to Rules 12.54 and 12.55 only

RULE 12.54 EXXON/MOBIL EPS BINARY CONTRACTS

(a) – (e) [unchanged]

(f) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by HedgeStreet at the time the Contracts are initially issued. The Payout Criteria of the Contracts will be set as follows:

(i) EXXON EPS EVENT DERIVATIVES CONTRACTS

(1) – (3) [unchanged]

(4) In each case, X equals the Quarterly ExxonMobil EPS released by the Source Agency. Additional Series of ExxonMobil EPS will be listed in consecutive increments of \$0.05 and the Payout Criteria will have a value less than the lowest existing Payout Criteria or greater than the highest existing Payout Criteria. For example, if the lowest Payout Criteria value currently is \$1.75, an additional Series of ExxonMobil EPS Contract may be listed at \$1.70. If the highest Payout Criteria value is \$1.85, an additional Series of ExxonMobil Contract may be listed at \$1.90. Each additional Payout Criterion will be a number, rounded to the nearest \$0.05. Additional Payout Criteria will adhere to this format and additional Series of Contracts may be added on any day up to and including the specified last trading day for a Series.

(ii) [unchanged]

(g) – (o) [unchanged]

RULE 12.55 WAL-MART EPS BINARY CONTRACTS

(a) – (e) [unchanged]

(f) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by HedgeStreet at the time the Contracts are initially issued. The Payout Criteria of the Contracts will be set as follows:

(i) WAL-MART EPS EVENT DERIVATIVES CONTRACTS

(1) – (3) [unchanged]

(4) In each case, X equals the Quarterly Wal-Mart EPS released by the