



**HEDGE
Street**

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February 22, 2005

Ms. Jean A. Webb
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street, NW
Washington, DC 20581

RE: Rule Certification: HedgeStreet filing an Amendment to existing Terms and Conditions for both Gold Hedgelet Contracts and Silver Hedgelet Contracts

Dear Secretary Webb:

In accordance with Commission Regulation §40.6(a)(2) and (3), HedgeStreet, Inc. ("HedgeStreet") hereby files with the Commission an amendment to the existing terms and conditions of both Gold Hedgelet Contracts and Silver Hedgelet Contracts (the "Contracts"). The new terms and conditions of the aforementioned Contracts are defined under Exhibit A, attached. The rule deletions are stricken out and the amendments or additions are underlined. HedgeStreet intends to implement these rule changes at the start of business on Wednesday, February 23, 2005.

No substantive opposing views were expressed to HedgeStreet with respect to these additions and amendments.

HedgeStreet hereby certifies that the Contracts and the clearing of the Contracts, including all rules defining the terms and conditions of said Contracts contained herein, complies with the Act and the Commission Regulations adopted thereunder.

Should you have any questions, please contact the undersigned at sford@hedgestreet.com or (650) 638-3511.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

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EXHIBIT A

RULE 12.10 GOLD CONTRACTS

(a) [unchanged]

(b) UNDERLYING – The Underlying for this Class of Contracts is the Gold price, per troy ounce (in US dollars), herein after referred to as “Gold”, as calculated by HedgeStreet using a proprietary algorithm which takes a sampling of prices¹ from a single month obtained from the ~~April-05~~ February, April, June, August, October and December months (collectively “Gold Month Cycle”) Gold Futures Contracts until the last four (4) days of the relevant month at which time the prices are obtained from the next succeeding month in the Gold Month Cycle currently trading in the COMEX Division on NYMEX²

(c) – (o) [unchanged]

RULE 12.11 – 12.28 [unchanged]

RULE 12.29 SILVER CONTRACTS

(a) [unchanged]

(b) UNDERLYING – The Underlying for this Class of Contracts is the Silver price per troy ounce (in US dollars), herein after referred to as “Silver”, as calculated by HedgeStreet using a proprietary algorithm which takes a sampling of prices⁵ from a single month obtained from the ~~March-05~~ January, March, May, July, September and December months (collectively “Silver Month Cycle”) Silver Futures Contracts until the last four (4) days of the relevant month at which time the prices are obtained from the next succeeding month in the Silver Month Cycle currently trading in the COMEX Division on the New York Mercantile Exchange (“NYMEX”⁶).

(c) – (o) [unchanged]

¹ The term “Prices” does not include any settlement prices calculated or issued by NYMEX. HedgeStreet only uses the prices reported on the exchange during the last 30 minutes of trading in order to formulate its own settlement price.

² NYMEX[®] 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.

⁵ *Supra*, at fn 1.

⁶ *Supra*, at fn 2.