



RECEIVED  
C.F.T.C.

2005 JUN 30 AM 9:06

OFFICE OF THE SECRETARIAT

June 29, 2005

VIA EMAIL: [secretary@cftc.gov](mailto:secretary@cftc.gov)

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

**RE: Trading Fees Discounted/ Quarterly Maintenance Fee Eliminated/  
HedgeStreet Free Trade Promotional Offer – Extension**

Dear Secretary Webb:

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 submits to the Commission i) changes to trading fees; ii) the elimination of the Quarterly Account Maintenance Fee; and iii) the extension of the 30 Day Free Trading Program..

- Effective July 1, 2005 – HedgeStreet trading fees and the range of Hedgelets for which the trading fees apply will be adjusted such that:

Number of Hedgelets Traded	Trading Fees
<del>Up to 100</del> <u>Up to 30</u>	<del>\$5.00 flat fee</del> <u>\$1.50 flat fee</u>
<del>101-1000</del> <u>31-1000</u>	\$0.05 per Hedgelet (unchanged)
1001+ (unchanged)	Discounts apply (unchanged)

- Effective July 1, 2005 – Quarterly Account Maintenance Fee Plan of \$10 which was originally submitted to the Commission on November 30, 2004 – will no longer be imposed; and
- Effective July 1, 2005 – HedgeStreet plans to extend its Special 30 Day Free Trade Promotional Offer (the “Promotion”). For the purposes of this extension, HedgeStreet is relying on its filing (which introduces the Promotion’s terms and conditions) previously submitted to the Commission on January 28, 2005. The same filing was later amended to extend the Program Period an additional three months (April 1<sup>st</sup> – June 30<sup>th</sup>) on March 22, 2005.

**The Promotion**

As a fully electronic, non-intermediated, retail-based contract market, HedgeStreet is primarily focused on the retail investor and optimizing his/her trading experience as an



exchange member. By providing an incentive for members to trade, HedgeStreet continues to implement ways of increasing market liquidity while gaining new market data in the products currently offered on the exchange.

There is a limit of one (1) member participant per household.

**Regulatory Issues**

HedgeStreet hereby certifies that the Promotion complies with the Commodity Exchange Act, as amended, and the Commissions regulations adopted thereunder.

The purpose of this letter is to notify the Commission of HedgeStreet's intention to a) discount the trading Fees and adjust the range of Hedgelets for which such trading fees apply; b) eliminate the Quarterly Account Maintenance Fee Plan; and c) extend the expiration of the Promotion Period from Thursday, June 30, 2005 to the end of business on Friday, September 30, 2005.

Should you have any questions or require additional information, please do not hesitate to contact the undersigned at (650) 638-3511 or [sford@hedgestreet.com](mailto:sford@hedgestreet.com).

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance

cc: Clarissa Manansala – HedgeStreet, Inc.