



July 12, 2005

VIA EMAIL: 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: Certification: HedgeStreet amending its market making rules to include the benefit of revenue sharing with HedgeStreet - Submission pursuant to Commission Regulation §40.6

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 an amendment to its market making rules in order to broaden the benefits available to market makers that satisfy all of the market maker obligations to include a revenue sharing benefit based on a percentage of the transaction volume in one or more Designated Classes of contracts¹. HedgeStreet has included under Exhibit A amendments to HedgeStreet Rule 4.4(b) in order to include the revenue sharing benefit.

HedgeStreet is not aware of any substantive opposing views to this rule amendment. HedgeStreet hereby certifies that these rule amendments comply with the Commodity Exchange Act, as amended, and the Commissions regulations adopted thereunder.

HedgeStreet intends to implement these rule amendments on Wednesday, July 13, 2005.

As a recently designated contract market, HedgeStreet has implemented market maker rules in order to promote liquidity in all contracts on the market. HedgeStreet would like to reward its market makers for fulfilling i) all of the market maker obligations as defined in Chapter 4 of HedgeStreet's rules; ii) all other member rules; and iii) those defined terms and conditions of the respective market maker agreement. Therefore, HedgeStreet is implementing the revenue sharing benefit to its rules. This revenue sharing benefit is designed to pay market makers a certain percentage based on the volume of executed transactions. Such percentage will be determined by HedgeStreet and defined in the market maker agreement.

¹ "Designated Classes" are those Classes of contracts in which a market maker has been appointed to abide by all of the market maker obligations defined in HedgeStreet Rule 4.5 as well as the respective market maker agreement.



All trades executed in Designated Classes by a market maker are eligible to be included in the benefit and the relevant percentages will be reflected in the market maker agreement.

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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.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

cc: Riva Adriance – CFTC
Clarissa Manansala – HedgeStreet, Inc.



EXHIBIT A

RULE 4.4 BENEFITS OF BECOMING A MARKET MAKER

(a) [unchanged]

(b) Market Makers shall receive reduced trading fees and/or participate in revenue sharing with HedgeStreet as an incentive for fulfilling the obligations of a market maker.

(c) - (d) [unchanged].