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October 13, 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: Rule Certification: HedgeStreet Amends "Weekly Contract" Definition

Dear Secretary Webb:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended ("Act"), and §40.6 of the regulations promulgated by the Commodity Futures Trading Commission (the "Commission") under the Act, HedgeStreet, Inc. ("HedgeStreet") hereby notifies the Commission of its intent to amend the definition of "Weekly Contracts", as it is currently represented under Rule 12.1(h). While this amendment is designed to more accurately define the listing cycle of those Weekly Contracts which are currently trading, or any Weekly Contracts that may trade in the future, this amendment does not affect the listing cycle of any actively traded Contracts on the HedgeStreet Market.

The amendments to the Weekly Contract definition are defined in Exhibit A in accordance with Commission Regulation §40.6. The rule deletions are stricken out and the amendments or additions are underlined. HedgeStreet intends to issue these Rule changes on Friday, October 14, 2005.

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

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

cc: Clarissa Manansala – HedgeStreet, Inc.



EXHIBIT A

Amendment to Rule 12.1(h)

(The following Rule additions are underlined and deletions are stricken out)

RULE 12.1 TERMS THAT ARE UNIFORM ACROSS CONTRACTS

(a) - (g) [unchanged]

(h) WEEKLY CONTRACTS mean a Series of Contracts that have a Payout Criterion based on the last reported level of the Underlying ~~at the end of the previous week~~ by the Source Agency. Weekly Contracts have an Expiration Date that is no less than five calendar days and no greater than seven calendar days from the date on which the last reported level of the Underlying is released by the Source Agency. Unless otherwise specified in these rules, this Series shall have an Expiration Date that is equal to the Last Trading Date of the current week.

(i) - (n) [unchanged]

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