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OFFICE OF THE SECRETARIAT

December 7, 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 amends its market making rules to postpone offering a revenue sharing benefit to eligible market makers - 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 withdraws its submission to the Commission dated July 12, 2005. Specifically, HedgeStreet amended its market making rules to offer a revenue sharing benefit to eligible market makers. HedgeStreet has decided to postpone offering the revenue sharing benefit until HedgeStreet has provided the Commission with further notification and information. The amendment to Rule 4.4(b) is referenced under Exhibit A. All rule deletions are stricken out and the amendments or additions are underlined.

HedgeStreet is not aware of any substantive opposing views to these rule amendments. 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 this rule amendment on Thursday, December 8, 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.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

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

www.hedgestreet.com

1825 S. Grant Street
Suite 500
San Mateo, CA 94402
Tel: 650.838.3500
Fax: 650.638.3501



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]

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