



October 18, 2006

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

Ms. Eileen A. Donovan, Acting Secretary  
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 the Minimum Tick size for its Consumer Price Index Binary Contracts; Submission made pursuant to Commission Regulation §40.6(a)**

Dear Acting Secretary Donovan:

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 certifies with the Commission its intent to increase the minimum tick size of the Consumer Price Index Binary Contracts from \$0.01 to \$0.50 ("Contracts").

HedgeStreet will first issue the Contracts with the amended Minimum Tick size on Thursday, October 19, 2006. Since the current Contracts that have a Minimum Tick of \$.01 had a Last Trade Date of Tuesday, October 17, 2006, there will be no open interest in such Contracts upon the close of business on Wednesday, October 18, 2006.

The amendments for these Contracts are defined in Exhibit A. The rule deletions are stricken out and the amendments and/or additions are underlined. No substantive opposing views were expressed to HedgeStreet with respect to these amendments.

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](mailto:sford@hedgestreet.com).

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance

cc: Tom Leahy – CFTC  
Phil Colling – CFTC  
Clarissa Manansala – HedgeStreet, Inc.

[www.hedgestreet.com](http://www.hedgestreet.com)

OFFICE OF THE SECRETARY

2006 OCT 19 PM 2:33

RECEIVED  
OCT 19 2006

1825 S. Grant Street  
Suite 500  
San Mateo, CA 94402  
Tel: 650.638.3500  
Fax: 650.638.3501



## EXHIBIT A

Amendment to Rule 12.58 only

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

### RULE 12.58 CONSUMER PRICE INDEX BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for the Consumer Price Index Binary Hedgelets shall be ~~\$0.01~~ \$0.50.

(h) – (o) [unchanged]

*[the remainder of this page is intended to be blank]*