



**HEDGE
Street**

October 27, 2006

VIA EMAIL: 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

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U.S. DEPARTMENT OF COMMERCE

RE: Rule Certification: HedgeStreet® a) Effects Amendments to the Underlying only for both Variable Payout and Binary Wholesale Gasoline Contracts; and b) Temporarily Delists the Weekly Currency Exchange EUR/USD Binary Contracts – Submission pursuant to Commission Regulation §40.6

Dear 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 submits to the Commission its intent to change the underlying for the Variable Payout and Binary Wholesale Gasoline Contracts from the front month Henry Hub Gasoline futures contract to the front month RBOB Gasoline futures contract currently trading on the New York Mercantile Exchange¹, referenced by Rules 12.83 and 12.84.

The amendments to the above-referenced Variable Payout and Binary Wholesale Gasoline Contracts will be made effective as of the start of business on Monday, October 30, 2006.

HedgeStreet also intends to temporarily delist its Weekly Currency Exchange EUR/USD Binary Contracts (the “Weekly EUR/ USD contracts”) represented by Rule 12.60 effective upon the Settlement Date of such contracts and until further notification to the Commission. Since the current Weekly EUR/ USD contracts have a Last Trade Date of Friday, October 27, 2006 there will be no open interest in such contracts upon the close of business of Friday, October 27, 2006.

The delisting of the Weekly Currency Exchange EUR/USD Binary Contracts will be made effective as of the close of business on Friday, October 27, 2006.

¹ NYMEX® is a registered service mark of the New York Mercantile Exchange, Inc. HedgeStreet, Inc. is not affiliated with the New York Mercantile Exchange, Inc. and neither the New York Mercantile Exchange, nor its affiliates, sponsor or endorse HedgeStreet, Inc. in any way



All amendments are defined in Exhibit A. Any rule deletions are stricken out while the amendments and/or additions are underlined.

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

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

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



EXHIBIT A

Amendments to Rules 12.83 and 12.84 only

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

RULE 12.83 WHOLESALE GASOLINE VARIABLE PAYOUT CONTRACTS

(a) [unchanged]

(b) UNDERLYING – The Underlying for this Class of Contracts is the Wholesale Gasoline price per gallon (in U.S. dollars), herein after referred to as “Wholesale Gasoline”, as calculated by HedgeStreet using a proprietary algorithm which takes a sampling of prices³⁴ obtained from the front month RBOB Gasoline Futures (NYMEX Division New York Harbor ~~Unleaded~~ RBOB Gasoline Futures) Contracts until the last two (2) days of the front month at which time the prices are obtained from the next succeeding month, currently trading on the New York Mercantile Exchange (NYMEX®)³⁵.

(c) - (o) [unchanged]

RULE 12.84 WHOLESALE GASOLINE BINARY HEDGELET CONTRACTS

(a) [unchanged]

(b) UNDERLYING – The Underlying for this Class of Contracts is the Wholesale Gasoline price per gallon (in U.S. dollars), herein after referred to as “Wholesale Gasoline”, as calculated by HedgeStreet using a proprietary algorithm which takes a sampling of prices³⁶ obtained from the front month RBOB Gasoline Futures (NYMEX Division New York Harbor ~~Unleaded~~ RBOB Gasoline Futures) Contracts until the last two (2) days of the front month at which time the prices are obtained from the next succeeding month, currently trading on the New York Mercantile Exchange (NYMEX®)³⁷.

(c) - (o) [unchanged]

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³⁴ *Supra, at fn 1.*

³⁵ *Supra, at fn 2.*

³⁶ *Supra, at fn 1.*

³⁷ *Supra, at fn 2.*