



December 29, 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

**RE: HedgeStreet, Inc. Amends the HedgeStreet Refer-A-Friend Program
and Extends such Program for One (1) Month**

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 submits to the Commission its intent to extend its current Refer-a-Friend Program which was originally certified to the Commission on April 13, 2005 with an amendment to such referral program submitted to the Commission on April 14, 2005 with an extension of such referral program submitted to the Commission on January 5, 2006 (collectively "Original Referral Program"). HedgeStreet amended the Original Referral Program on November 16, 2006 in order to replace one of the Incentives with an iPod® shuffle™¹ ("Amended Referral Program"). HedgeStreet will now be extending the Original Referral Program for one (1) additional month and will replace the iPod® shuffle™ Incentive offered in the Amended Referral Program with a \$50 Amazon.com² Gift Certificate in accordance with the Original Referral Program. In other words, all of the terms and conditions of the Original Referral Program will be in full force and effect starting on January 2, 2007. The Referrer will receive an Amazon.com Gift Certificate in the amount of \$50 for each of the three (3) Referees that satisfy the terms and conditions of the Original

¹ iPod® is a registered trade mark of the Apple Computer, Inc. Shuffle™ is a trade mark of Apple Computer, Inc. HedgeStreet, Inc. is not affiliated with the Apple Computer, Inc. and neither the Apple Computer, Inc. nor its affiliates, sponsor or endorse HedgeStreet, Inc. in any way.

² Amazon.com® is a registered trade mark of Amazon.com, Inc. HedgeStreet, Inc. is not affiliated with the Apple Computer, Inc. and neither the Amazon.com, Inc. nor its affiliates, sponsor or endorse HedgeStreet, Inc. in any way.

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Referral Program. The Referees will receive sixty (60) days of free trading. The Original Referral Program will be extended through Wednesday, January 31, 2007.

No substantive opposing views were expressed to HedgeStreet with respect to amending and/or extending the Original Referral Program.

HedgeStreet hereby certifies that the Promotion complies with the Commodity Exchange Act, as amended, and the Commissions regulations adopted thereunder.

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.



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Ms. Eileen A. Donovan
Secretary of the Commission
Commodity Futures Trading Commission
3 Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

RE: Certification: HedgeStreet Free Trade Promotional Offer – Extension

Dear Secretary Donovan:

HedgeStreet, Inc. (“HedgeStreet”), a designated contract market (“DCM”) and derivatives clearing organization (“DCO”), hereby notifies the Commission that HedgeStreet is extending its Special Free Trade Promotional Offer (the “Free Trade Promotion”). For the purposes of this extension, HedgeStreet is relying on its initial filing (which introduces the Promotion’s terms and conditions) previously submitted to the Commission on January 28, 2005. The Promotion was later amended on four separate occasions to a) extend the Promotion period by three months (April 1, 2005 – June 30, 2005) on March 22, 2005; b) to extend the Promotion period by an additional three months (July 1, 2005 – September 30, 2005) on June 29, 2005; c) to extend the Promotion period by an additional three months (September 30, 2005 – December 31, 2005) on September 26, 2005; and lastly d) to extend the Promotion period by one year from (December 31, 2005 – December 31, 2006) on January 5, 2006.

The Promotion

As a fully electronic, non-intermediated, retail-based contract market, HedgeStreet is primarily focused on the retail investor and optimizing his/her trading experience as an exchange member. By providing an incentive for members to trade, HedgeStreet continues to implement ways of increasing market liquidity while gaining new market data in the products currently offered on the exchange. There is a limit of one (1) member participant per household.

Regulatory Issues

HedgeStreet hereby certifies that the Promotion complies with the Commodity Exchange Act, as amended, and the Commissions regulations adopted thereunder.

The purpose of this letter is to notify the Commission of HedgeStreet’s intention to extend the period of effectiveness for the Special Free Trade Promotional Offer through Friday, March 30, 2007.



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
Toby Kaczensky – CFTC
Clarissa Manansala – HedgeStreet, Inc.