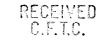
## HedgeStreet, EXCHANGE



2EB FEB -8 PM 3:35

OFC. OF THE SECRETARIAT

## February 8, 2008

Via E-Mail: submissions@cftc.gov

Mr. David Stawick Secretary of the Commission Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20581

## RE: [Revised] Rule Certification: HedgeStreet Announces New Market Maker – Submission pursuant to Commission Regulation §40.6(a) and Commission Regulation 145.9

Dear Mr. Stawick:

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 the designation of a new market maker (the "Market Maker") on HedgeStreet that will make markets in all products defined in Table 1 of Appendix A. HedgeStreet petitions the Commission, pursuant to Regulation 145.9, 17 C.F.R. §145.9, for confidential treatment of the spread and size information in Table 1 to Appendix A.

HedgeStreet describes in Exhibit 1 to Appendix B the structure and controls in place at both HedgeStreet and the Market Maker in order to ensure that there is adequate separation between the two entities and that the trading activities of the Market Maker are objectively reviewed and investigated. Exhibit 2 to Appendix B gives an example of certain qualifying questions that are currently posed to both member applicants and their authorized traders during the membership application process that must be truthfully answered in order for such market participants to have access to the HedgeStreet Market. The Market Maker's authorized trader(s) will also be required to answer all of the qualifying questions contained in Exhibit 2, and HedgeStreet will be responsible for confirming the accuracy of the responses in a similar fashion in the way HedgeStreet conducts background checks on all member applicants and their authorized traders. Exhibit 3 provides a description of the disclosure of material non-public information policy in place at HedgeStreet.

Please be advised that Table 1 to Appendix A of this Certification contains trade secrets or confidential commercial or financial information of HedgeStreet. HedgeStreet has therefore

1825 S. Grant Street Sulte 500 San Mateo, CA 94402 Tel: 650.638,3500 Fax: 650.638,3501

www.hedgestreet.com

## HedgeStreet.

petitioned for confidential treatment to be afforded to the spread and size information in Table 1 to Appendix A of this Certification pursuant to Commission Regulation 145.9, 17 C.F.R. §145.9, until HedgeStreet notifies the Commission that HedgeStreet no longer regards such information as confidential.

The Market Maker will commence making markets on HedgeStreet no later than February 11, 2008. There were no substantive opposing views expressed in approving these amendments.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 674-4835 or by email at tmcdermott@hedgestreet.com.

Sincerely

Fimothy G. McDeholott General Counsel and Chief Compliance Officer

Attachments

cc: Riva Adriance – CFTC Nancy Markowitz – CFTC Ed Dasso -- NFA David Yeres – Clifford Chance Yossi Beinart – HedgeStreet, Inc.

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