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October 6, 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: Rule Certification: HedgeStreet[®] Amends the Minimum Tick size for Various 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 following Binary Contracts ("Contracts"):

Category	HedgeStreet Rule	Asset/ Duration	Effective Date	Max Settlement Value \$10 or \$100	NEW Minimum Tick Size
Currencies	12.60	Daily & Weekly EUR/USD 12PM, 3PM, 8PM ET CLOSE	10/9/06	\$10	\$0.05
	12.61	Weekly GBP/USD 12PM, 3PM, 8PM ET CLOSE	10/9/06	\$10	\$0.05
	12.62	Weekly USD/YEN 12PM, 3PM, 8PM ET CLOSE	10/9/06	\$10	\$0.05
	12.63	Weekly USD/CHF 12PM, 3PM, 8PM ET CLOSE	10/9/06	\$10	\$0.05
	12.78	Weekly USD/CAD 12PM, 3PM, 8PM ET CLOSE	10/9/06	\$10	\$0.05
Commodities	12.66	Daily & Weekly Gold 11:30AM, 1:30PM ET CLOSE	10/9/06	\$10	\$0.05
	12.70	SPOT Silver	10/9/06	\$10	\$0.05
	12.77	SPOT Copper	10/9/06	\$10	\$0.05
Fuels	12.59	SPOT Crude Oil	10/9/06	\$100	\$0.50
	12.68	SPOT Natural Gas	10/9/06	\$100	\$0.50
	12.82	SPOT Heating Oil	10/9/06	\$100	\$0.50
	12.84	SPOT Wholesale Gas	10/9/06	\$100	\$0.50
Employment	12.69	MONTHLY Nonfarm Payrolls	10/9/06	\$100	\$0.50



HedgeStreet will first issue the Contracts with the amended Minimum Tick size on Monday, October 9, 2006. Since the current Contracts that have a Minimum Tick of \$.01 have a Last Trade Date of Friday, October 6, 2006, there will be no open interest in such Contracts upon the close of business on Friday, October 6, 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.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

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



EXHIBIT A

Amendments to Rules 12.59(g), 12.60(g), 12.61(g), 12.62(g), 12.63(g), 12.66(g), 12.68(g),
12.69(g), 12.70(g), 12.77(g), 12.78(g), 12.82(g), and 12.84(g)

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

RULE 12.59 CRUDE OIL BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for Crude Oil Binary Hedgelet Contracts shall be ~~\$0.04~~ \$0.50.

(h) – (o) [unchanged]

RULE 12.60 CURRENCY EXCHANGE EUR/USD BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for EUR/USD Binary Hedgelets shall be ~~\$0.04~~ \$0.05.

(h) – (o) [unchanged]

RULE 12.61 CURRENCY EXCHANGE GBP/USD BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for the GBP/USD Binary Hedgelets shall be ~~\$0.04~~ \$0.05.

(h) – (o) [unchanged]

RULE 12.62 CURRENCY EXCHANGE USD/YEN BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for the USD/YEN Binary Hedgelets shall be ~~\$0.04~~ \$0.05.

(h) – (o) [unchanged]



RULE 12.63 CURRENCY EXCHANGE USD/CHF BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) **MINIMUM TICK** – The Minimum Tick size for the USD/CHF Binary Hedgelets shall be ~~\$0.04~~ \$0.05.

(h) – (o) [unchanged]

RULES 12.64-12.65 [unchanged]

RULE 12.66 GOLD BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) **MINIMUM TICK** – The Minimum Tick size for Gold Binary Hedgelets shall be ~~\$0.04~~ \$0.05.

(h) – (o) [unchanged]

RULE 12.67 [unchanged]

RULE 12.68 NATURAL GAS BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) **MINIMUM TICK** – The Minimum Tick size for Natural Gas Binary Hedgelets shall be ~~\$0.04~~ \$0.50.

(h) – (o) [unchanged]

RULE 12.69 NONFARM PAYROLLS BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) **MINIMUM TICK** – The Minimum Tick size for Nonfarm Payrolls Binary Hedgelets shall be ~~\$0.04~~ \$0.50.

(h) – (o) [unchanged]

RULE 12.70 SILVER BINARY HEDGELET CONTRACTS



(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for Silver Binary Hedgelets shall be ~~\$0.01~~ \$0.05.

(h) – (o) [unchanged]

RULES 12.71 – 12.76 [unchanged]

RULE 12.77 COPPER BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for the Copper Binary Hedgelets shall be ~~\$0.01~~ \$0.05.

(h) – (o) [unchanged]

RULE 12.78 CURRENCY EXCHANGE USD/CAD BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for the USD/CAD Binary Hedgelets shall be ~~\$0.01~~ \$0.05.

(h) – (o) [unchanged]

RULE 12.79 – 12.81 [unchanged]

RULE 12.82 HEATING OIL BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for Heating Oil Binary Hedgelets shall be ~~\$0.01~~ \$0.50.

(h) – (o) [unchanged]

RULE 12.83 [unchanged]

RULE 12.84 WHOLESALE GASOLINE BINARY HEDGELET CONTRACTS



(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for the Wholesale Gasoline Binary Hedgelet Contracts shall be ~~\$0.04~~ \$0.50.

(h) – (o) [unchanged]

RULES 12.85-12.86 [unchanged]

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