**HEDGE
Street**

October 25, 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 its
         Federal Funds 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 Federal Funds Binary
Contracts from $0.01 to $0.50 ("Contracts").

HedgeStreet will first issue the Contracts with the amended Minimum Tick size on
Thursday, October 26, 2006. Since the current Contracts that have a Minimum Tick of $.01
had a Last Trade Date of Monday, October 23, 2006, there will be no open interest in such
Contracts upon the close of business on Wednesday, October 25, 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

Amendment to Rule 12.64 only
(The following new Rule additions are underlined and deletions are stricken out)

RULE 12.64 FEDERAL FUNDS BINARY HEDGELET CONTRACTS

(a) – (f) [unchanged]

(g) MINIMUM TICK – The Minimum Tick size for the Federal Funds Binary Hedgelets shall be ~~$0.01~~ $0.50.

(h) – (o) [unchanged]

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