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March 30, 2007

VIA EMAIL: [secretary@cftc.gov](mailto:secretary@cftc.gov)

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 Extends Free Trade Promotional Offer**

Dear Acting 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 five 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; d) to extend the Promotion period by one year (December 31, 2005 – December 31, 2006) on January 5, 2006; and lastly e) to extend the Promotion period by an additional three months (December 31, 2006 – March 30, 2007) on December 29, 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, June 29, 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](mailto:sford@hedgestreet.com).

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance

cc: Riva Adriance – CFTC  
Clarissa Manansala – HedgeStreet, Inc.