



July 12, 2004

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

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

2004 JUL 13 AM 9:06

PROPERTY  
OFFICE

**RE: Self-Certification filing amending HedgeStreet Rule 3.5(b) – (d)**

Dear Secretary Webb:

In accordance with Commission Regulation 40.6(a)(2) and (3), HedgeStreet, Inc. (“HedgeStreet”) hereby files with the Commission the amendments described below with the text of the rules stated in Exhibit A. The rule deletions are stricken out and the amendments or additions are underlined. HedgeStreet intends to implement these amendments on July 13, 2004. No substantive opposing views were expressed to HedgeStreet with respect to these amendments. HedgeStreet hereby certifies that HedgeStreet’s Rules, as amended by these amendments, comply with the Commodity Exchange Act, as amended, and the Commission’s regulations adopted thereunder.

**DESCRIPTION OF AMENDMENTS**

**Rule 3.5 (b) – (d)**

HedgeStreet has changed these rules to remove the fees from the HedgeStreet rule book and put such fees on the HedgeStreet website.



**EXHIBIT A**

**RULE 1.1 DUES, FEES, AND EXPENSES PAYABLE BY MEMBERS**

(a) [unchanged]

(b) Members are charged fees for trading Hedgelet Contracts. The fees for trading Fixed Payout Hedgelet Contracts are charged in an amount to be reflected from time to time on HedgeStreet's website.

(c) Members are charged fees for settlement of Hedgelet Contracts at Expiration and for Redemption of Hedgelet Pairs to HedgeStreet. Fees for settlement of Hedgelet Contracts will be charged in an amount to be reflected from time to time on HedgeStreet's website. range from \$.10 to \$.30 per in-the-money Contract. The same fees will apply per Hedgelet Pair Redeemed. The fees are as follows:

| Number of Contracts Settled/Pairs Redeemed | Fee per in-the-money Contract/Pair Redemption |
|--|---|
| 1 to 1,000                                 | \$.30   |
| 1,001 to 10,000                            | \$.25   |
| 10,001 to 100,000                          | \$.15   |
| 100,001+                                   | \$.10   |

(d) HedgeStreet or its settlement bank will also deduct from your account expenses incurred in connection with your trading or account activity, such as fees for wire transfers, check processing via e-ValuCheck. All such fees will be charged in an amount to be reflected from time to time on HedgeStreet's website, as follows:

| Transfer Type   | Fee    |
|---|--------|
| New Financial Institution Account Set-Up Fee            | \$10   |
| Each E Value Check (EVC) Deposit                        | \$1.75 |
| Wire Transfer Deposit greater than \$10,000 w/Email     | \$0    |
| Wire Transfer Deposit less than \$10,000 w/Email        | \$20   |
| Wire Transfer Deposit greater than \$10,000 w/out Email | \$10   |
| Wire Transfer Deposit less than \$10,000 w/out Email    | \$100  |
| Automated Clearing House (ACH) Withdrawal               | \$2.00 |
| Wire Transfer Withdrawal (exception)                    | \$75   |

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|                              |       |
|------------------------------|-------|
| Check Withdrawal (exception) | \$100 |
| Bounced check (exception)    | \$25  |

(e) [unchanged]

\* \* \*

Should you have any questions regarding the above, please do not hesitate to contact me.

Sincerely,

Stephanie Ford  
Vice President, Legal & Compliance