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November 13, 2008

Via E-Mail: submissions@cftc.gov

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

RE: Rule Certification: HedgeStreet's listing of new FTSE 100[®] Future Binary Hedgelet Contracts – Submission pursuant to Commission Regulations §§ 40.2 and 40.6(a)

Dear Mr. Stawick:

Pursuant to Section 5c(c)(1) of the Commodity Exchange Act, as amended ("Act"), and sections 40.2 and 40.6(a) of the regulations promulgated by the Commodity Futures Trading Commission (the "Commission") under the Act (the "Regulations"), HedgeStreet, Inc. ("HedgeStreet") hereby submits to the Commission the terms and conditions of the FTSE 100[®] Future Binary Contract (the "Binary Contract"). The Binary Contract, which is a cash-settled binary option, will have an Expiration Value that is calculated based on an average of the most recent trade prices in the underlying futures contract, the FTSE 100[®] Futures Contract (the "FFC"), immediately prior to the Binary Contract's expiration.

In Exhibit A, HedgeStreet has set forth the text of new HedgeStreet Rule 12.76 to reflect all of the terms and conditions of the new Binary Contract in accordance with Commission Regulations §§40.2 and 40.6.

The FFC is traded on Liffe[®], which currently lists FCC's with quarterly expirations (March, June, September, and December). It is offered in the United State pursuant to Commission no-action relief received in 1990.¹ The FFC is currently a deep and liquid futures market. The index which

¹ On January 16, 1990, the Commission issued a No-Action Letter to the London International Financial Futures and Options Exchange (the predecessor of Liffe) with respect to the offer and sale of the FFC in the United States. CFTC Interpretative Letter No. 90-1, [1987-1990 Transfer Binder] Comm. Fut. L. Rep. (CCH) ¶24,582 (Jan. 16, 1990).

HedgeStreet.

EXCHANGE

underlies the FFC is the FTSE 100[®] index (the "Index"). A widely traded cash market currently exists on the London Stock Exchange for the securities that comprise the Index.

HedgeStreet has no ownership or other interest in either the cash market for the securities that comprise the Index or the FFC. In addition, HedgeStreet is not affiliated with the London Stock Exchange or Liffe, and neither the London Stock Exchange nor Liffe, nor any of their respective affiliates sponsor or endorse HedgeStreet or its products, including the Binary Contract, in any way. HedgeStreet, however, is a signatory to the International Information Memorandum of Understanding & Agreement as is Liffe. In addition, HedgeStreet is a member of the Intermarket Surveillance Group ("ISG"), and both the London Stock Exchange and the Liffe Exchange also are ISG members.

The Binary Contract will be offered with one-day and one-week durations. With respect to each Binary Contract listed, the underlying futures contract will be the nearest FFC, up to and including the Friday of the week immediately preceding the final settlement of that particular FFC. On the business day that immediately succeeds such a Friday, the underlying futures contract for each Binary Contract will roll over to the next quarterly FFC. Because the Expiration Value of the Binary Contract "rolls over" to the prices of the next-to-expire FFC approximately one week before the expiration the underlying FFC, the Binary Contract will never have an Expiration Value based upon the final settlement price (or an average of trade prices) at an FFC maturity when it converges with the Index value. Thus, the Binary Contract Expiration Value will be linked to the FFC rather than to the Index.

HedgeStreet, as the Source Agency, will calculate an Expiration Value for each Binary Contract by taking the last twenty-five (25) FFC trade prices immediately prior to the expiration of the FTSE 100 Future Binary Contract, removing the highest five (5) FFC prices and the lowest five (5) FFC prices, using the remaining fifteen (15) FFC prices to calculate the Expiration Value. The calculation is a simple average of all fifteen (15) remaining FFC prices.

The calculation methodology for the Expiration Values mitigates the possibilities of manipulation or any party trading with advance knowledge of the Expiration Value prior to expiration of the Binary Contract. The underlying FFCs are traded in real-time; it is not possible for an "early" release of FFC trade prices or the relevant Expiration Value for the Binary Contract to occur, as trading in the Binary Contract on the HedgeStreet exchange ceases concurrently with the fixing of the relevant prices that will be used in calculating the Expiration Value. On the Expiration Date, HedgeStreet will publish on its website the Expiration Value for each listed Binary Contract at least 15 minutes after that expiration of the Binary Contract.

As explained above, the Binary Contract is a binary option on an actively traded broad-based securities index futures contract, the FFC, and its pricing will be based solely upon FFC prices. Because the FFC is itself based upon an index which is not a "narrow-based security index" as defined in Section 1a(25) of the Act, the Binary Option is within the Commission's exclusive regulatory jurisdiction.

HedgeStreet. EXCHANGE

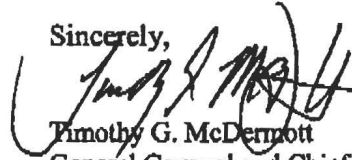
HedgeStreet intends to implement these rule additions and list the Binary Contract effective at the start of business on Monday, November 17, 2008.

No substantive opposing views were expressed to HedgeStreet with respect to these additions.

HedgeStreet hereby certifies that the Binary Contract and clearing of the Binary Contract, including all rules defining the terms and conditions of said Binary Contract contained herein, comply with the Act, as amended, and the Commission's regulations adopted thereunder.

Should you have any questions regarding the above, please do not hesitate to contact me by telephone at (312) 884-0171 or by email at timcdermott@hedgestreet.com.

Sincerely,



Timothy G. McDermott
General Counsel and Chief Compliance Officer

CC: DMOSubmission@cftc.gov
Jon Hultquist – CFTC (Acting Branch Chief, DMO, Chicago)
Tom Leahy – CFTC
Riva Adriance – CFTC
Nancy Markowitz – CFTC

Ed Dasso – NFA
Yossi Beinart - HedgeStreet, Inc.

EXHIBIT A

New Rule 12.76

RULE 12.76 FTSE 100[®] FUTURE BINARY HEDGELET CONTRACTS

(a) **SCOPE** – These Rules shall apply to the Class of Contracts referred to as the FTSE 100 Future Binary Hedgelet Contracts issued by HedgeStreet.

(b) **UNDERLYING** – The Underlying for this Class of Binary Contracts is the price (in British Pounds) of the FTSE 100 Futures contracts (“FFC”) traded on the Liffe[®] exchange (Liffe).¹ The FFC trade prices that will be used for the Underlying will be taken from four (4) FFC delivery months: March, June, September, or December (each a “FFC Delivery Month”). The specific FFC Delivery Month that will be used as the Underlying will be based on the FFC represented in the following schedule of dates for September 2008 through December 2009:

Start Date	End Date	FFC Delivery Month Used as the Underlying and to Calculate the Expiration Value
9/13/2008	12/12/2008	Liffe FTSE 100 December 2008 Future (expires 12/19/08)
12/13/2008	3/13/2009	Liffe FTSE 100 March 2009 Future (expires 3/20/09)
3/14/2009	6/12/2009	Liffe FTSE 100 June 2009 Future (expires 6/19/09)
6/13/2009	9/11/2009	Liffe FTSE 100 September 2009 Future (expires 9/18/09)
9/12/2009	12/11/2009	Liffe FTSE 100 December 2009 Future (expires 12/18/09)

On the date listed in the ‘Start Date’ column above, the FFC trade prices to be used for the Underlying and to calculate the Expiration Value will be the FFC trade prices for the corresponding FFC Delivery Month listed. For instance, beginning on September 13, 2008, HedgeStreet will use the Liffe FTSE 100

¹ FTSE[®] and FTSE 100[®] are trade marks of the London Stock Exchange plc (“LSE”) and the Financial Times Limited (“FT”) and is used by FTSE International Limited (“FTSE”) under license. The prices relating to any index are not in any way sponsored, endorsed or promoted by FTSE or by the LSE or by FT and neither FTSE nor LSE nor FT makes any warranty or representation whatsoever, expressly or impliedly, either as to the results to be obtained from the use of such prices and/or the figure at which any index stands at any particular time on any particular day or otherwise. Neither FTSE nor LSE nor FT shall be liable (whether in negligence or otherwise) to any person for any error in any index and neither FTSE nor LSE nor FT shall be under any obligation to advise any person of any error therein. The FTSE Future Binary Option Contracts are not sponsored, endorsed, sold or promoted by FTSE, LSE or FT. FTSE, LSE and FT do not accept any liability in connection with the trading of these products.

Liffe[®] is a registered mark of LIFFE Administration and Management Corporation (“Liffe”). The FTSE Future Binary Option Contracts are not sponsored, endorsed, sold or promoted by Liffe.

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December 2008 future prices as the Underlying and will use trade prices for the December 2008 FTSE 100 futures contract to calculate the Expiration Value on the Expiration Date for the relevant FTSE 100 Future Binary Contract.

(c) SOURCE AGENCY – The Source Agency is the HedgeStreet.

(d) TYPE – The type of Contract is a Binary Hedgelet Contract.

(e) ISSUANCE – For each planned release by the Source Agency of the Underlying, HedgeStreet will issue various Hedgelet Contracts, each of a different Series. A new issuance of Hedgelet Contracts will commence no later than two (2) business days following the Expiration Date.

(f) PAYOUT CRITERION – The Payout Criterion for each Contract will be set by HedgeStreet at the time the Binary Contracts are initially issued. For the FTSE 100 Future Binary Hedgelet Contract, the Payout Criteria for the Contracts will be set as follows:

(i) DAILY FTSE 100 FUTURE BINARY HEDGELET CONTRACTS, 4:00 PM
(ET) CLOSE

- X - 200. (1) Binary Hedgelet Contract 1: One Contract will have a Payout Criterion of greater than
- X - 180. (2) Binary Hedgelet Contract 2: One Contract will have a Payout Criterion of greater than
- X - 160. (3) Binary Hedgelet Contract 3: One Contract will have a Payout Criterion of greater than
- X - 140. (4) Binary Hedgelet Contract 4: One Contract will have a Payout Criterion of greater than
- X - 120. (5) Binary Hedgelet Contract 5: One Contract will have a Payout Criterion of greater than
- X - 100. (6) Binary Hedgelet Contract 6: One Contract will have a Payout Criterion of greater than
- X - 80. (7) Binary Hedgelet Contract 7: One Contract will have a Payout Criterion of greater than
- X - 60. (8) Binary Hedgelet Contract 8: One Contract will have a Payout Criterion of greater than

HedgeStreet. EXCHANGE

(9) Binary Hedgelet Contract 9: One Contract will have a Payout Criterion of greater than X - 40.

(10) Binary Hedgelet Contract 10: One Contract will have a Payout Criterion of greater than X - 20.

(11) Binary Hedgelet Contract 11: One Contract will have a Payout Criterion of greater than X.

(12) Binary Hedgelet Contract 12: One Contract will have a Payout Criterion of greater than X + 20.

(13) Binary Hedgelet Contract 13: One Contract will have a Payout Criterion of greater than X + 40.

(14) Binary Hedgelet Contract 14: One Contract will have a Payout Criterion of greater than X + 60.

(15) Binary Hedgelet Contract 15: One Contract will have a Payout Criterion of greater than X + 80.

(16) Binary Hedgelet Contract 16: One Contract will have a Payout Criterion of greater than X + 100.

(17) Binary Hedgelet Contract 17: One Contract will have a Payout Criterion of greater than X + 120.

(18) Binary Hedgelet Contract 18: One Contract will have a Payout Criterion of greater than X + 140.

(19) Binary Hedgelet Contract 19: One Contract will have a Payout Criterion of greater than X + 160.

(20) Binary Hedgelet Contract 20: One Contract will have a Payout Criterion of greater than X + 180.

(21) Binary Hedgelet Contract 21: One Contract will have a Payout Criterion of greater than X + 200.

(22) In each case above, "X" equals the last FFC trade price, as reported by the Source Agency, rounded to the nearest twenty (20).

(ii) WEEKLY FTSE 100 FUTURE BINARY HEDGELET CONTRACTS, 4:00 PM (ET) CLOSE

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X - 300. (1) Binary Hedgelet Contract 1: One Contract will have a Payout Criterion of greater than

X - 250. (2) Binary Hedgelet Contract 2: One Contract will have a Payout Criterion of greater than

X - 200. (3) Binary Hedgelet Contract 3: One Contract will have a Payout Criterion of greater than

X - 150. (4) Binary Hedgelet Contract 4: One Contract will have a Payout Criterion of greater than

X - 100. (5) Binary Hedgelet Contract 5: One Contract will have a Payout Criterion of greater than

X - 50. (6) Binary Hedgelet Contract 6: One Contract will have a Payout Criterion of greater than

X. (7) Binary Hedgelet Contract 7: One Contract will have a Payout Criterion of greater than

X + 50. (8) Binary Hedgelet Contract 8: One Contract will have a Payout Criterion of greater than

X + 100. (9) Binary Hedgelet Contract 9: One Contract will have a Payout Criterion of greater than

than X + 150. (10) Binary Hedgelet Contract 10: One Contract will have a Payout Criterion of greater

than X + 200. (11) Binary Hedgelet Contract 11: One Contract will have a Payout Criterion of greater

than X + 250. (12) Binary Hedgelet Contract 12: One Contract will have a Payout Criterion of greater

than X + 300. (13) Binary Hedgelet Contract 13: One Contract will have a Payout Criterion of greater

(14) In each case above, "X" equals the last FFC trade price, as reported by the Source Agency, rounded to the nearest value ending in either twenty-five (25) or seventy-five (75).

HedgeStreet. EXCHANGE

(iii) HedgeStreet may list additional FTSE 100 Future Binary Hedgelet Contracts with different ranges of Payout Criteria on a discretionary basis in accordance with the CEA and Commission Regulations.

(g) **MINIMUM TICK** – The Minimum Tick size for the FTSE 100 Future Binary Hedgelet Contracts shall be \$0.25.

(h) **REPORTING LEVEL** – The Reporting Level for the FTSE 100 Future Binary Hedgelets shall be 1,750 Contracts.

(i) **POSITION LIMIT** – The Position Limits for the FTSE 100 Future Binary Hedgelets shall be 2,500 Contracts.

(j) **LAST TRADING DATE** – The Last Trading Date in a Series is the same date as the Expiration Date.

(k) **SETTLEMENT DATE** – The Settlement Date in a Series is the same date as the Expiration Date.

(l) **EXPIRATION DATE** – The Expiration Date of the Contract will be the date for which the relevant FFC daily settlement price is released by the Source Agency.

(m) **SETTLEMENT VALUE** – The Settlement Value is the amount paid to the holder of the in-the-money Contract on the Settlement Date. The Settlement Value of an in-the-money FTSE 100 Future Binary Hedgelet Contract is \$100.

(n) **EXPIRATION VALUE** – The Expiration Value is the level of FFC release number on the Expiration Date. The Expiration Value is calculated by the Source Agency by taking the last twenty-five (25) FFC trade prices just prior to the close of trading of the FTSE 100 Future Binary Contract and removing the highest five (5) FFC trade prices and the lowest five (5) FFC trade prices, using the remaining fifteen (15) FFC trade prices to calculate the Expiration Value. The calculation used is a simple average of all fifteen (15) remaining FFC trade prices.

(o) **CONTINGENCIES** – If no daily settlement price of the relevant FFC is announced by the Source Agency, the Settlement Date will be delayed until such daily settlement price for that Series is released and publicly available.

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