



October 24, 2005

VIA EMAIL: secretary@cftc.gov

Ms. Jean A. Webb
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

RE: Amended HedgeStreet Submission pursuant to Commission Regulation 40.5

Dear Secretary Webb:

Pursuant to a request from Commission staff, HedgeStreet, Inc. ("HedgeStreet") hereby submits revised documentation to its initial submission dated September 6, 2005 in support of HedgeStreet's request for Commission review and approval and a request to amend its order of designation as a contract market pursuant to Section 5(c) of the Commodity Exchange Act (the "Act") and Commission Regulation 38.4(a), and 40.5.

This letter is intended to provide a list of the additional information requested by Commission staff.

Appendices to Submission

Revised Request of Commission Review and Approval Submission pursuant to Commission Regulation 40.5

Appendix 1 – HedgeStreet Institutional Rulebook

Appendix 2 - HedgeStreet Institutional Rulebook (Redline)

Appendix 3 – Chart of Designation Criteria

Appendix 4 – Chart of Compliance with Core Principles

Appendix 5a – 5g Regulatory Services Agreement with National Futures Association

Appendix 6 – Appendix 6 – Responses to staff questions dated September 22, 2005 (The staff posed additional questions verbally subsequent to receipt of the September 22, 2005 document and incorporated those additional questions therein.)

Appendix 7 – Executed Clearing Services Agreement

Appendix 8 – Responses to Staff Consolidated (This document represents responses to all of staff questions dated May 9, May 30, June 28, July 8 and September 21, 2005)

Please be advised that Appendices 5 and 7 contain trade secrets or confidential commercial or financial information of HedgeStreet. Therefore, on September 6, 2005, HedgeStreet petitioned for confidential treatment to be afforded to these documents pursuant to Commission Regulation 145.9 until HedgeStreet notifies the Commission that HedgeStreet, Inc., no longer regards such information as confidential.



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If you have any questions concerning this submission, please contact me at sford@hedgestreet.com.

Sincerely,

Stephanie Ford
Vice President, Legal & Compliance

Attachments

cc: Ms. Jane Croessmann – CFTC
Ms. Riva Adriance - CFTC
Mr. Tom Bloom - CFTC