

August 14, 2002

Ontario Securities Commission
20 Queen Street West
Suite 800, Box 55
Toronto, Ontario
M5H 3S8

Attention: John Stevenson, Secretary

Dear Sirs:

Re: Comments to Multilateral Instrument 31-102, Companion Policy 31-102CP and NRD

Listed below are the comments from our firm:

1. Implementation

Consider deferring the NRD implementation to Spring of 2003. The proposed implementation date of November 25, 2002 does not allow sufficient time for training and system readiness of member firms. In addition, the date is too close to the annual renewal date of some provinces of December 31st.

2. Part 6 - Temporary Hardship Exemption

Please clarify if "unanticipated technical difficulties" is limited to technical problems due to NRD system and/or as a result of internal system problems of the NRD filer.

If an NRD filer encounters such difficulties (regardless of origin) on the 5th business day, is there an 'extension' or 'consideration' period given to allow for the filing to be done in paper format?

3. Permanent Record

It would be helpful to firms if basic registration information could be accessed (with the individual's consent) in determining training, educational requirements, etc. on potential candidates.

Please clarify whether Form 33-109F4 can be printed in its entirety prior to submission. A clean copy is preferred as opposed to screen prints. This is necessary for non-resident jurisdiction such as Florida that requires a copy of submitted application in the home jurisdiction of the applicant.

4. NRD - Technical Questions

Consider providing a forum whereby the Registrants' technical or IS departments can meet with and ask questions of the design team of the NRD system. This would be most beneficial to the member firms who must make plans for in-house technical support.

Your consideration of the above comments is greatly appreciated and we look forward to reviewing your response.

Yours truly,
EDWARD JONES

Judy Nicholson
Team Leader - Registration