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September 21, 2011

British Columbia Securities Commission  
Alberta Securities Commission  
Saskatchewan Securities Commission  
Manitoba Securities Commission  
Ontario Securities Commission  
Autorite des marches financiers  
New Brunswick Securities Commission  
Superintendent of Securities, Prince Edward Island  
Nova Scotia Securities Commission  
Superintendent of Securities, Newfoundland and Labrador  
Superintendent of Securities, Northwest Territories  
Superintendent of Securities, Yukon Territory  
Superintendent of Securities, Nunavut

John Stevenson  
Secretary  
Ontario Securities Commission  
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Me Anne-Marie Beaudoin  
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**Re: Proposed Amendments to National Instrument 31-103: Cost Disclosure and Performance Reporting**

We are writing to provide comments to the proposed amendments to National Instrument 31-103 Registration Requirements and Exemptions: Cost disclosure and Performance Reporting (the "Proposals").

Queensbury Group was formed in 1987. Queensbury Strategies Inc. ("Queensbury") is our Mutual Fund Dealership. We are a Level 4 dealer with 52 mutual fund representatives and 260M of AUM.



We have read and are in agreement with the letter put forward by The Investment Funds Institute of Canada (“IFIC”) on September 7, 2011 and would like to further comment.

While Queensbury agree generally with the focus of the CSA’s proposal – that is, ensuring investors have an understanding of the cost of investing, as well as how well their investments are performing – we believe refinements are necessary to the CSA’s proposals to allow for effective and cost-efficient compliance, to acknowledge the regulatory regime that applies to investment funds and also to achieve the CSA’s investor protection and education goals.

The proposed amendments focus primarily on disclosure of costs associated with mutual fund and fixed income investing – this focus is not explained by the CSA. In our view, the focus on mutual fund investing gives rise to an undue emphasis on the costs of investing in mutual funds, over other types of investments.

The CSA propose to require registered firms to supplement disclosure that clearly appears in investment fund prospectuses. The proposed amendments do not refer to the prospectus and other disclosure documents, including the Fund Facts, which is curious given the focus of the last number of years by the CSA on the necessity and usefulness of the Fund Facts document to ensure very clear and simple disclosure to investors.

We ask that continued review by the CSA of the proposed disclosure about commission received by registered firms, particularly since the CSA only refer to the receipt of trailing commission payments by registered firms, without recognition of other commissions, such as the initial sales commissions paid in respect of trades in DSC mutual funds.

We are concerned that conclusions reached following lengthy public consultation by the MFDA, as reflected in MFDA Rule 5.3.5 are balanced in their application, and believe that they should not be set aside by these Proposals. We ask that the CSA allow the SRO’s to develop rules for the regulation of performance reporting and cost disclosure of their members, and exempt SRO members from compliance with the Proposals.

Again, we believe that the IFIC recommendations meet the needs of all stakeholders and we recommend that you consider them seriously as you decide on next steps for this initiative.

Yours truly,

Queensbury Strategies Inc.

Betty Jo Royce

President