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Delivered via facsimile: pbrady@bcsc.bc.ca; consultation-en-cours@cvmq.com

Dear Sir/Madamme:

Re: Proposed National Instrument 51-102 Continuous Disclosure Obligations (the "Instrument"), Form 51-102F1, Form 51-102F2, Form 51-102F3, Form 51-102F4, Form 51-102F5, Form 51-102F6 (collectively, the "Forms"), and Companion Policy 51-102CP Continuous Disclosure Obligations (the "Policy")

It is with grave concern that I write in support of the comment letter provided by Mr. Matt Bootle, Director, Accounting Standards, TSX Venture Exchange. ("TSXv")

It is apparent to me that there is a rush into throwing a plethora of new regulations at the Canadian capital markets without taking into account any consideration as to the consequences of these actions. Moreover, what is the motivation behind these actions, and what is the expected outcome from these actions? I fear that the Emperor has no clothes.

Observations from a recent BusinessWeek article, August 26, 2002:

"But while outraged politicians and regulators demand more, one vital point goes ignored. Investors don't just want more information-- they want better information."

"Since communicating a company's relevant information to investors is the whole idea behind filing quarterly and annual reports, it's a serious problem that these documents are becoming impenetrable.

"Overwhelmed by this flood of useless data, investors are increasingly relying on intermediaries (analysts) to interpret what it all means."

There is much truth in these aforementioned observations. And as Mr. Bootle so accurately points out, most TSXv companies do not have analyst coverage, thus investors are left to their own accord when trying to flail their way through the voluminous disclosure that they already receive.

I believe that consideration has not been given to the monetary implications that the proposed Instrument and Policy will have on the smaller companies in Canada. The mid, small, and micro cap companies in Canada simply cannot afford any further increase in regulatory expenses. We could point to many examples in which this Policy and Instrument will unfairly discriminate against small companies trying to transact business.

I have spent the last nine years assisting over 60 small companies in going public. In the last two years I have consistently been told, by the ever dwindling number of companies going public, that is no longer economically viable to become a public company in Canada. These small companies are what support the economy in Canada. Have you seen any of the top 50 large cap companies in Canada announce any hiring over the past 24 months?

I believe that there is a complete disconnect between what it is that is trying to be accomplished, and the method by which it is trying to be achieved, by proposing the Instrument and the Policy in question.

The author of the Policy and the Instrument in question is also very likely authoring the death of the capital markets in Canada.

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