



October 16, 2009

BC Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission
Manitoba Securities Commission
Ontario Securities Commission
Autorité des marchés financier
New Brunswick Securities Commission
Registrar of Securities, Prince Edward Island
Nova Scotia Securities Commission
Superintendent of Securities, Newfoundland & Labrador
Registrar of Securities, Northwest Territories
Superintendent of Securities, Yukon Territory
Registrar of Securities, Nunavut

Attention: John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West, Suite 1903, Box 55
Toronto, ON, M5H 3S8

M^e Anne-Marie Beaudoin
Corporate Secretary
Autorité des marchés financiers
800, square Victoria, 22^e étage
C.P. 246, tour de la Bourse
Montréal (Québec) H4Z 1G3

Dear Sir/Madame:

RE: CSA Notice and Request for Comment on Implementation of Point of Sale Disclosure for Mutual Funds

Thank you for allowing us the opportunity to submit comments on the Implementation of Point of Sale Disclosure.

Our firm is a mutual fund dealer that is licensed in all provinces. We are members of the ACCP, Federation of Independent Mutual Fund Members, Advocis and IFIC. In addition, members of our senior management regularly participate in industry related working groups.

We wish to lend our support to the responses, comments and recommendations submitted to you by the Investment Funds Institute of Canada (IFIC) dated October 14/09.

We fully agree with and support the IFIC comment letter. In particular, our firm would like to specifically express our full agreement to the following sections of the IFIC comment letter:

- Delivery Requirements and Operational Efficiency
- Adopting a Feasible Plan for Transition
- Under Section – Detailed Comments and Related Recommendations
 - * Attachment 2, CSA Question 4 - In addition to the IFIC recommendations, we ask that additional consideration be given to the procedure and cost involved for implementing a method for dealer firms to track and communicate to fund companies when a client wishes to obtain the Fund Facts along with the trade confirmation, rather than at the time of sale. Trade confirmations are sent to the client by fund companies, for client name accounts. ESG requirements may be required to allow for XML tags to be sent to fund companies along with the purchase order.

In addition, with regards to Compliance Tracking of the delivery & receipt of the Fund Facts disclosure, we ask for clarification as to which licensee, regulator or entity will be responsible to monitor delivery of Fund Facts for segregated fund purchases? Segregated funds are an insurance product/policy and life licensed individuals are under self-regulation and/or regulated by FSCO.

We trust that consideration will be given to the comments received on the Point of Sale Disclosure initiative, as the policy will greatly impact all stakeholders.

If you have any questions regarding this submission, please contact me directly by phone at 613-738-3388 x 221 or by email at avalenti@joinipg.com.

Sincerely,



Anne Valenti
Vice President
Chief Compliance Officer