

BY EMAIL: jstevenson@osc.gov.on.ca; consultation-en-cours@lautorite.qc.ca

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British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission
Manitoba Securities Commission
Ontario Securities Commission
Autorité des marchés financiers
New Brunswick Securities Commission
Registrar 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
20 Queen Street West, Suite 1903, Box 55
Toronto, ON M5H 3S8

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

Dear Sir/Madame:

Re: Implementation of Stage 2 of Point of Sale Disclosure for Mutual Funds

We are pleased to provide InvestorPOS' response to the Canadian Security Administrators' (CSA) Request for Comments on Proposed Amendments to National Instrument 81-101 *Mutual Fund Prospectus Disclosure*, Form 81-101F3 and Companion Policy 81-101CP *Mutual Fund Prospectus Disclosure* and Consequential Amendments (the "Proposed Amendments").

InvestorPOS™ is an innovative new company that offers solutions for investment fund managers and dealers to efficiently create and deliver Fund Facts and other disclosure documents to investors.

We support the CSA's staged implementation of Point of Sale delivery of Fund Facts documents as it allows industry to plan for and implement the most efficient means of realizing the CSA's vision and its three principles: providing investors with key

information about a fund; providing the information in a simple, accessible and comparable format; and providing the information before investors make their decision to buy.

With the implementation of Stage 1, Fund Facts are now available in the marketplace and investors and advisors are growing familiar with the new document. To that end, we have been instrumental in assisting fund companies with the automated publishing of their Fund Facts, and also automating the placement of the documents on their web sites. We have also launched www.InvestorPOS.com, the only industry repository for dealers and their advisors to search the entire universe of Fund Facts and deliver them electronically or in printed format to their investors in a simple, secure and compliant manner. This can be done either prior to, at, or following the point of sale. Version 2 of www.InvestorPOS.com provides investors with this same access to all of the Fund Facts in Canada, without the delivery and compliance functionality.

The implementation of Stage 2 will allow industry stakeholders to realize the CSA-stated benefits associated with delivery of the Fund Facts documents in lieu of the simplified prospectus. In turn, investors will benefit as well. We are working with organizations now to ensure they are able to take advantage of this development as soon as possible. Other investment fund products may take advantage of this same solution in time.

We are confident that with continued consultation and a graduated implementation process, the Proposed Amendments can provide efficiencies to the manufacturers and dealers in facilitating clear and concise communication to investors. InvestorPOS™ looks forward to being an active facilitator of this collaboration using its deep industry experience and willingness to establish new business frameworks that benefit manufacturers, dealers and investors alike.

Sincerely,

A handwritten signature in black ink, appearing to read 'ABoright', with a stylized 'L' at the end.

Anthony Boright, President
InvestorPOS™
aboright@investorpos.com