

26 May 2000

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

Re: Policy 57-603 Defaults By Reporting Issuers in Complying With Financial Statement Filing Requirements

Dear Sir:

The Canadian Advocacy Council (CAC) of the Association for Investment Management and Research (AIMR)¹ is pleased to respond to the request for comments of the Ontario Securities Commission (OSC) regarding the above-noted proposed Policy. The CAC is comprised of investment professionals from across Canada who review new regulatory, legislative, and standard setting developments affecting AIMR's Canadian membership of over 5,200 members.

We support the OSC's approach to maintaining enforcement of timely disclosure requirements for reporting issuers while allowing innocent shareholders to continue to trade where there is sufficient information available in the market place. We believe the Policy represents a reasonable compromise between the competing interests of full disclosure to potential investors in the market and preserving the rights of existing shareholders.

We also advocate harmonization of regulatory policies across Canada on this issue. We do not believe that it is in the interests of the investing public or the efficient functioning of the capital markets for enforcement mechanisms and the consequences of non-compliance by reporting issuers to differ among jurisdictions. We urge the other Canadian jurisdictions to adopt the proposed Ontario policy.

We appreciate the opportunity to provide submissions on this issue. If you have any questions or would like additional information, please do not hesitate to contact Gillian Ewing at 403.299.3079 or Philippa Hughes at 804.951.5332.

¹ AIMR is a global, nonprofit organization of over 41,000 investment professionals in 70 countries. Through its headquarters in Charlottesville, Virginia and 95 Member Societies and Chapters throughout the world, AIMR provides global leadership in investment education, professional standards, and advocacy programs.

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Sincerely,

Gillian Ewing, CFA
Canadian Advocacy Council Co-Chair

Philippa P.B. Hughes
Associate General Counsel
AIMR Advocacy Program

cc. British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Securities Commission
The Manitoba Securities Commission
Commission des valeurs mobilières du Québec
Office of the Administrator, New Brunswick
Registrar of Securities, Prince Edward Island
Nova Scotia Securities Commission
Securities Division, Newfoundland and Labrador
Registrar of Securities, Northwest Territories
Registrar of Securities, Yukon Territory
Registrar of Securities, Nunavut

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9/21/01 1:54 PM by Philippa Hughes