

Mr. John Stevenson, Secretary to the Commission
Ontario Securities Commission
Cadillac Fairview Tower
20 Queen Street West
Suite 800, Box 55
Toronto, Ontario
M5H 3S8

And

M^c Claude St Pierre
Secretary to the Commission
Commission des valeurs mobilières du Québec
800, square Victoria
C.P. 246, Tour de la Bourse
Montréal, Québec
H4Z 1G3

August 31, 2000

Subject: CSA Staff Request for Comment 13-401 - Request for Changes, Additions or Improvements for a Revised SEDAR System

Dear Sirs:

We appreciate the opportunity to comment on a revised SEDAR system. It is our belief that SEDAR II should be built as an Internet-based system. The Internet is the easiest and most efficient method to distribute electronic-based material in the world today.

Our comments focus on the "search and retrieval" functionality. This is the area we are most interested in as it represents the primary use we make of SEDAR. Our specific comments address parts of all three areas where the CSA staff requested comments.

Mr. John Stevenson and M^e Claude St Pierre

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We strongly encourage the CSA staff to approve enhancements increasing the search capabilities of SEDAR, including full-text searches of individual documents. Our major use of SEDAR.com is the retrieval of financial statements and other documents for the purposes of identifying and considering relevant examples of specific accounting situations. Enhanced search capabilities, including the full-text searching of documents, would significantly increase the usefulness of SEDAR to us, other public accounting firms, regulators and management of public companies. We believe that full-text search capability is a relatively easy feature to add to the existing database given the search engines and index utilities available today.

We encourage the retention of the ability to search by document type as can be done in SEDAR.com currently.

The usefulness of this search capability would be enhanced if "interim" and "annual" financial statements were separately classified as document types instead of being included in the single category of financial statements.

Ideally, we would like to see searches that could be based on information in the company profile as well as in the document itself. We would like the ability to search all documents using a combination of fields and full text searching within specified areas of the documents. An example of such a search would be:

- Document Type is "Annual Financial Statement" and Date of Filing is between "A" and "B" and Assets is more than "\$C" and Significant Accounting Policies Note includes the text "D".

It is understood that this level of search capability would require filers to use XBRL and the "tagging" of documents. It would also require the development of a suitable interface to allow users to effectively assess the relevance of the found documents, and then access or download the relevant parts of selected documents. We believe that the "tagging" of documents into standardized sections would significantly enhance the searchability of documents. More efficient searches could then be conducted on specific sections. The inclusion of standardized tagging would likely result in a minimal cost for filers.



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We believe it would be appropriate to charge a premium for advanced search capabilities, including full-text searches of the contents of documents. We would be very interested in discussing the fee structure for the advanced search capabilities described above. We believe that we would not be alone in this regard.

It might be useful for the CSA staff to consider the functionality of a private website in the US for EDGAR documents. "www.tenkwizard.com" provides full-text searching by form type, form group, company name, SEC code and/or a date range. We find the functionality of www.tenkwizard extremely useful for the search and retrieval of financial statements, prospectuses and other documents filed with the U.S. Securities and Exchange Commission.

We trust that our comments will be helpful to the Commission and would be pleased to discuss them at your convenience. Please feel free to contact Michael A. Tambosso at 416 941 8388 or Sean Cable at 416 814 5734.

Yours very truly,

PricewaterhouseCoopers

Chartered Accountants