

# GOODMAN PHILLIPS & VINEBERG

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## ***Memorandum***

TO : CLAUDE ST-PIERRE, Secretary to the Commission  
Commission des valeurs mobilières du Québec

JOHN STEVENSON, Secretary to the Commission  
Ontario Securities Commission

C.C. : MARYSE BERTRAND

FROM : JOSÉE DANSEREAU, paralegal, securities

DATE : September 25, 2001

SUBJECT : CSA Staff Request for Comment 13-401 – Request for  
changes, additions or improvements for a revised SEDAR  
system

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The following comments originate in part from the suggestions provided in the foregoing Request for Comment 13-401 and in part from daily use of SEDAR.

### **PART I: CHANGES, ADDITIONS OR IMPROVEMENTS TO FILING PROCESS**

- Eliminate e-mail between users: This function is limited to SEDAR users and redundant with Internet e-mail.
- Allow search profiles from profile management: Would streamline available functions.
- Add a system to avoid the creation of duplicate profiles: Would avoid clogging the system with unnecessary data.
- Allow the change from other filer profile to other issuer profile: Would facilitate process.
- Add the ability to retain historic information in issuer profiles: In particular, it should be mandatory that previous issuer name(s) remain in the issuer profile, to facilitate searches if only the previous name is known.
- Add searches by document type as in SEDAR.com: Provide an extensive list of document types.

- All documents required to be filed with the CSA should be filed through SEDAR: This would eliminate questions as to whether the filing is or is not a SEDAR filing. It would also eliminate the need to attend at CSA offices to search for documents not filed through SEDAR. Since insider reports will shortly be available through Internet, this would provide a complete picture of the issuer.
- Provide Internet access to other filer profiles and documents filed.
- Fees payable to the CSA vary greatly depending on issuer and documents filed: For example, in prospectus filings, additional fees are payable in some provinces if there is more than one class of shares, if there are selling shareholders, etc. It would be confusing to allow SEDAR to calculate some filings and not all. Rather, those filings where no fees are payable should indicate as such or not allow access to the fees module.

## **PART II: CHANGES, ADDITIONS OR IMPROVEMENTS RE: PROPOSED ENHANCEMENTS**

- The complete description entered for "other" document type should appear in SEDAR.com list of documents: Would facilitate identifying documents in SEDAR.com.
- Add a search mechanism in the fee schedule of each province to facilitate identification of appropriate fees.
- Allow the viewing of contact information to obtain secondary access to a project.
- In a searched filing, add the ability to retrieve more than one highlighted document without having to approve the user defined setting for each document.
- Add a notification if document sent in user's workspace.
- Streamline available fields in all modules, i.e. search, columns to view, inquiries. Many fields in the current lists are rarely used and could be deleted.
- Remove condensed list option from filing management.

## **PART III: SERVICES CHARGED AT A PREMIUM TO SOME USERS**

- Allow full text searches: Would be an improvement if searches were not limited to certain fields.
- Allow immediate access to documents on SEDAR.com: Would benefit investors.
- Add a notification of documents filed: Would benefit investors.

## **PART IV: GENERAL COMMENTS**

- A requirement or reminder to filers to request that only valid documents remain public, i.e. where documents are replaced due to errors, that filers request the CSA to have access to previous filing be made private.
- A prominent reminder to filers that cover letters are not necessary, unless it provides information not indicated elsewhere.