

November 1, 2000

Canadian Securities Administrators

Re: NI 54-101 and Related Instruments

Dear Sirs:

Pacific Corporate Trust Company is proud to act as transfer agent and registrar for a steadily expanding list of publicly traded corporations now numbering over 600. As a result, we face daily comments about the inefficiencies and frustrations experienced by issuers attempting to communicate with their non-registered shareholders. We do not hear the same comments about communicating with the registered holders.

Issuers and confused, disenfranchised holders attempting to vote at shareholder meetings object strongly about the current process dictated by National Policy 41.

However, once the mailing and meeting are over for another year, they all become silent as they must concentrate on other matters. Consequently, when the issuers find that another year has rolled by and they must again struggle under the existing process, we become the recipient of further complaints; often to the effect that we have had all year to fix the process and we have done nothing.

It is therefore a pleasure to find the CSA finally producing a new version of NI 54-101 that seems to deal with most of the comments arising from previous publications.

Recognizing that issuers were too busy to stop and read the new draft, we prepared a one-page note that we faxed to our clients and some members of the legal profession involved in corporate and securities practice. The note outlined points that we felt would be important to issuers, including our belief that they or their agent would be able to directly communicate with and receive votes from the non-registered holders who had not objected to their name being released to issuers. We pointed out that issuers could be excluded from communicating electronically with the same holders by reason of the consent to electronic communication being limited to usage only by the intermediary who had obtained the authorization.

While our fall 2000 newsletter gave full details of the new draft instrument and suggested that issuers comment to the members of the CSA, we realized that very few issuers would have the resources and time to follow the complex process outlined by the CSA to effect a filing of a formal comment letter. Therefore, our recent fax suggested that, if the issuer was in agreement with the process, they simply sign and return a copy of the fax that they received and that we would relay their response to the CSA members. To date, we have received more than 130 responses, all agreeing with the points and concerns raised by ourselves. Attached is a current list of responders.

We trust that this will be of assistance in evaluating the concerns of issuers.

Yours truly,

John A. Halse
President & C.E.O.
Pacific Corporate Trust Company

Fax responses received from:

Clients:

Admiral Bay Resources Inc.

Agro International Holdings Inc.

Alcanta International Education Ltd.

Alexis Resources Ltd.

Ambassador Industries Ltd.

American Wild Woodland Ginseng Corp

Apac Minerals Inc.

Archangel Diamond Corporation

Arlington Ventures Ltd.

Athlone Minerals Ltd.

Atikokan Resources Inc.

Atna Resources Ltd.

Austin Developments Corp.

Automated Recycling Inc.

AVC Venture Capital

Ballad Enterprises Ltd.

Bard Ventures Ltd.

Bargold Resources Ltd.

BCY Ventures Inc.

Big Star Energy Inc.

Blackling Oil Corporation

Can Alaskantures Ltd.

Cantrell Capital Corp.

Castle Metals Corporation

Century Gold Corp.

Circumpacific Energy Corp.

Clickhouse.com Online Inc.

Consolidated Kaitone Holdings Ltd.

CPAC (Care) Holdings Ltd.

Curion Venture Corp.

Digital Atheneum Technology Corporation

Discfactories Corporation

Donner Minerals Ltd.

Dxstorm.com Inc.

Earl Resources Limited

Eastfield Resources Limited

eDispatch.com Wireless Data Inc.

Don Schick
Frank Ott

El Nino Ventures Ltd.

eVirus Software Corporation

Fancamp Exploration Limited

First Au Strategies Corp.

Foxpoint Resources Ltd.

GenSci Regeneration Sciences Inc.

Global Cogenix Industrial Corp.

Global Election Systems Inc.

Golden Cariboo Resources Ltd.

Goldengoals.com Ventures Inc.

Golden Temple Mining Corp.
Grand Resource Corporation
Green Valley Mine Inc.
Hedong Energy Inc.
Hymex Diamond Corp.
IMC Ventures Inc.
Inca Pacific Resources Inc .
Integrated Business Systems and Services Inc.
International Absorbents Inc.
International Alliance Resources Inc.
International Croesus Ventures Corp.
International Freehold Mineral Development
International Road Dynamics Inc.
International Rochester Energy Corp.
International Sunstate Ventures Ltd.
Intracoastal System Engineering Corporation
Island-Arc Resources Corp.
IVS Intelligent Vehicle System Inc.
Kalimantan Gold Corporation Limited
Kingston Resources Ltd.
Kiwi Charter Corp.
Lakewood Mining Company Limited
Lasik Vision Corporation
Leigh Resource Corporation
Lucky Strike Resources Ltd.

Maximum Resources Inc.
Menika Mining Limited
Next Millenium Commercial Corp.
New Shoshoni Ventures Ltd.
Novadx International Inc.
Novawest Resources Inc.
NTS Computer Systems Ltd.
Nuequs Petroleum Corporation
Olympus Stone Inc.
Omni Resources Inc.
Pacific Booker Minerals Inc.
Pacific North West Capital
Pacific Topaz Resources Ltd.
Petromin Resources Ltd.
Platinex Inc.
Polymer Solutions Inc.
Powerhouse Energy Corp.
Powertech Industries Inc.
Prospector International Resources Inc.
Randsburg International Gold Corp.
Ravenhead Recovery Corp.
Rock Resources Inc.
San Telmo Resources Ltd.
Seacrest Development Corp.
Seine River Resources Inc.

Setanta Ventures Inc.
Soligen Technologies Inc.
Spectrum Games Corporation
Tearlach Resources Ltd.
Technovision Systems Inc.
Tiger International Resources Inc.
Trade Wind Communications Limited
Tres-Or Resources Limited
Trivalence Mining Corporation
Tyhee Development Corp.
Unique Broadband Systems inc.
United Bolero Development Corp.
U. S. Cobalt Inc.
U. S. Diamond Corporation
Ventir Challenge Enterprises Ltd.
Vertigo Software Corp.
Visionquest Enterprise Group Inc.
Walloper Gold Resources Limited
WestBond Enterprises Corporation
Whitegold Resource Corp.
White Knight Resources Ltd.

LAWYERS:

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David J. McCue

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Tracey Gibb

Dumoulin Black

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