

November 14, 2000

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Securities Commission
The Manitoba Securities Commission
Ontario Securities Commission
Office of the Administrator, New Brunswick
Registrar of Securities, Prince Edward Island
Nova Scotia Securities Commission
Securities Commission of Newfoundland
Registrar of Securities, Northwest Territories
Registrar of Securities, Nunavut
Registrar of Securities, Yukon Territory

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

Claude St-Pierre, Secrétaire
Commission des valeurs mobilières du Québec
800 Victoria Square
Stock Exchange Tower
P.O. Box 246, 23rd Floor
Montréal, Québec H4Z 1G3

Dear Sirs:

**Re: Proposed Rule 55-102 - System for
Electronic Data on Insiders (SEDI)**

I understand that the Ontario Securities Commission proposes to change the above Rule so as to impose on all insiders of reporting issuers the requirement to file insider reports electronically.

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I would ask you to please consider the following objections to this proposal.

I believe this proposed Rule change will substantially increase the exposure of insiders and the reporting system to the risk of inaccurate reporting and failure to report on a timely basis. In my view, most of the insiders of Canadian corporations whom I know **S** and I know quite a few **S** are not sufficiently acquainted or comfortable with the use of computers or the Internet to be able to file their insider reports electronically. While this is true of many of the insiders who are officers of corporations, it is doubly so in respect of those who are outside directors. Many of this latter group have no support staff to file on their behalf.

If third parties are to be counted on to report on behalf of an insider, important issues arise as to the verification of reports for accuracy and the lack of nexus between the individual responsible for filing his or her report and the individual who actually does so. These problems become increasingly complex for overseas directors and directors who operate from their homes with no support staff and at some distance from the offices of the reporting issuer.

When the foregoing difficulties are coupled with the recent compressing of time for the filing of reports to ten days, the potential for difficulties and errors increases exponentially.

I urge the Commission not to proceed with the proposed Rule change.

Yours sincerely,

Edward Johnson
Vice-President, General Counsel
and Secretary