



David J. Hipgrave, CMA, P.Eng.
President and Chief Executive Officer

September 25, 2003

Ontario Securities Commission
Commission des valeurs mobilières du Québec
Alberta Securities Commission
The Manitoba Securities Commission
Registrar of Securities, Government of Yukon
Registrar of Securities, Department of Justice, Government of the Northwest Territories
Securities Commission of Newfoundland and Labrador
Nova Scotia Securities Commission
Saskatchewan Financial Services Commission
Office of the Attorney General, Prince Edward Island
Registrar of Securities, Legal Registries Division, Department of Justice, Government of
Nunavut
Department of Justice, Securities Administration Branch, New Brunswick

in care of:

John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
Suite 1900, Box 55
Toronto, Ontario M5H 3S8

Denise Brosseau, Secretary
Commission des valeurs mobilières du Québec
Stock Exchange Tower
800 Victoria Square
P.O. Box 246, 22nd Floor
Montréal, Québec H4Z 1G3

Dear Mr. Stevenson and Ms. Brosseau:

Certified Management Accountants of Ontario (CMA Ontario) would like to take this opportunity to offer comments on the proposed **Multilateral Instrument 52-108 Auditor Oversight**. Under the Proposed Instrument, reporting issuers will be required to engage auditors that are participants in good standing with the Canadian Public Accountability Board (CPAB) and that participate in the CPAB Oversight Program.

On behalf of CMA Ontario, I am writing to reiterate concerns that the CMA profession has expressed regarding the CPAB.

When the CPAB was announced in July 2002, we welcomed the announced measures as a first step in strengthening confidence in capital markets and the auditing profession. However, we also expressed two primary concerns about the efficacy of the CPAB system:

1. the exclusion of other professional accountants who are not CAs, many of whom have the legislated authority to conduct public audits in various Canadian jurisdictions. In Ontario, legislative reform is currently in progress to open access to public accounting practice to CMAs and CGAs, in addition to CAs. To ensure transparency and protection of the public, we believe that it is important that all three professional accounting bodies in Canada be involved in the development of measures to restore confidence in auditing processes.
2. the continuing focus on enhancing compliance with existing auditing procedures and accounting standards. We believe that strengthened oversight of auditors of Canada's public companies should be accompanied by the creation of an independent Canadian accounting standards-setting body.

To our knowledge, these matters remain unresolved and our concerns are heightened by the required participation in the CPAB by auditors of reporting issuers as proposed under Multilateral Instrument 52-108.

Yours truly,



David Hipgrave, CMA, P.Eng.
President and Chief Executive Officer
Certified Management Accountants of Ontario