

December 9, 2004

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission
Manitoba Securities Commission
Ontario Securities Commission
Autorite des marches financiers
Nova Scotia Securities Commission
New Brunswick Securities Commission
Office of the Attorney General, Prince Edward Island
Securities Commission of Newfoundland and Labrador
Registrar of Securities, Government of Yukon
Registrar of Securities, Department of Justice, Government of the Northwest Territories
Registrar of Securities, Legal Registries Division, Department of Justice, Government of Nunavut

Delivered c/o:

John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
Suite 1900, Box 55
Toronto, Ontario M5H 3S8
Fax: (416) 593-8145
e-mail: jstevenson@osc.gov.on.ca

Anne-Marie Beaudoin
Directrice du secretariat
Autorite des marches financiers
Tour de la Bourse
88, square Victoria
C.P. 246, 22 etage
Montreal, Quebec H4Z 1G3
Fax: (514) 864-6381
e-mail: consultation-en-cours@lautorite.qc.ca

Notice and Request for Comment

**Proposed National Policy 58-201
Corporate Governance Guidelines**

**Proposed National Instrument 58-101
Disclosure of Corporate Governance Practices,
Form 58-101F1 and Form 58-101F2**

We are writing in response to your Request for Comment.

Pulse Data Inc. is listed on the TSX (trading symbol: PSD) and is a reporting issuer in British Columbia, Alberta, Saskatchewan, Manitoba, Ontario and Quebec.

Our only comment concerns timing.

Please do not implement the final National Policy and National Instrument for the 2005 proxy season. Reporting issuers will need sufficient time to properly compare their corporate governance practices against the proposed guidelines under the National Policy and to properly prepare the required disclosure under the National Instrument. Reporting issuers will not have sufficient time to do so for the 2005 proxy season, given the number of other substantive changes and reduced filing periods for 2005 under MI 52-109, MI 52-110 and MI 51-102.

We suggest that the 2006 proxy season would be more appropriate.

Thank you for considering our comment.

Ken MacDonald
President and CEO

Arthur Dumont
Chair, Corporate Governance
Committee