



March 7, 2008

John Carchrae
Chief Accountant
Ontario Securities Commission
20 Queen St. West
Toronto, Ontario
M5H 3S8

RE: CSA Concept Paper 52-402 – Possible changes to securities rules relating to International Financial Reporting Standards

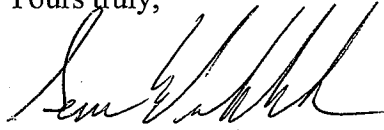
I am writing to provide input on the above-noted Concept Paper, specifically with respect to the requirement for Canadian-based U.S. domestic filers to prepare financial statements in accordance with IFRS-IASB.

While the intent of Concept Paper 52-402 is to create "a single set of high quality accounting standards", encouraging comparability for investors and analysts and cost efficiency for the filers, I believe this Concept Paper falls short of its intent in practical terms.

- Firstly, US GAAP in and of itself is a set of high-quality accounting standards that are accepted and understood globally. More importantly these standards are accepted and understood by U.S. resident shareholders that represent the predominant stakeholders of Canadian-based U.S. domestic filers.
- Secondly, as it relates to comparability for investors and analysts, Canadian-based U.S. domestic filers will be disadvantaged to their U.S. peer group who will not be required to prepare IFRS based financial statements. Practically, the U.S. domestic filer is predominantly owned by U.S. resident shareholders and comparability will be lost and so would the associated capital that we compete for in the United States.
- Lastly, as a U.S. domestic filer we would be forced to prepare two sets of financial statements, one based on IFRS and one based on U.S. GAAP, to retain our ability to acquire capital in the United States and maintain compliance with our financial agreements. This from a practical standpoint undoubtedly defeats the intent by increasing costs and complexity for Canadian companies.

Although it appears to be a forgone conclusion that IFRS will be imported into Canadian GAAP, a practical solution for Canadian-based U.S. domestic filers would be to defer the requirement to adopt IFRS until such time that the SEC mandates IFRS based GAAP in the United States. Otherwise in all practical terms, the CSA has failed to recognize the predominantly U.S. resident shareholder base and as such, the Canadian-based U.S. domestic filer would be competitively disadvantaged to their U.S. peer group.

Yours truly,

A handwritten signature in black ink, appearing to read "Sean Washchuk", written over a horizontal line.

Sean Washchuk
Vice President Finance &
Chief Financial Officer



April 11, 2008

Mrs. Carla-Marie Hait
Chief Accountant, Corporate Finance
British Columbia Securities Commission
chait@bcsc.bc.ca

Mrs. Sylvie Anctil-Bavas
Chef comptable
Autorité des marchés financiers
sylvie.anctil-bavas@lautorite.qc.ca

Subject: CSA Concept Paper 52-402
Possible changes to securities rules relating to International Financial Reporting Standards

Dear Mrs. Hait and Mrs. Anctil-Bavas:

We have read the attached response letter dated April 7, 2008, and submitted by Canadian National Railway ("CN") with respect to CSA Concept Paper 52-402, "Possible changes to securities rules relating to International Financial Reporting Standards." We are in full agreement with the responses and the examples discussed in that letter. In particular, we strongly feel that Canadian companies that have prevailed themselves of the choice given to them by the Canadian regulators of filing US GAAP financial statements should be allowed to continue to do so until such time as U.S. domestic companies are required to adopt IFRS.

We thought that it would be more efficient and convenient for you by expressing our response in this manner and we trust that you will consider our comments in the final version.

Yours truly,

A handwritten signature in black ink, appearing to read "Sean P. Washchuk". The signature is fluid and cursive, with the first name "Sean" being more prominent.

Sean P. Washchuk
Vice President Finance &
Chief Financial Officer

cc: Fred Snell, Chief Accountant, Alberta Securities Commission
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John Carchrae, Chief Accountant, Ontario Securities Commission
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