

April 22, 2008

John Stevenson, Secretary  
Ontario Securities Commission  
20 Queen Street West  
19th Floor, Box 55  
Toronto, ON  
M5H 3S8

**Re: Proposed National Instrument 31-103**

Dear Mr. Stevenson

Thank-you for allowing me the opportunity to comment on the proposed NI 31-103. My wife and I are Ontario residents and for the last 15 years all of our hard work has gone to invest 100% in Canadian mutual funds with the hope someday that we will be able to retire comfortably without the assistance of any government. Last year I had to take a leave from my work as a veterinarian as the stress of trying to practice and oversee finishing our new home at the same time became too much after our contractor refused to honour our contract. We needed to stay in the area to provide assistance to my wife's parents and I am also responsible for a trust account I manage for my disabled brother. I am still unable to get my career back on track and I have to be very careful with our expenses.

I have tried to understand the proposed instrument and what the cost impact will be for small investors like ourselves and I find it impossible to determine. I must wonder if anyone, other than a few very specialized lawyers, fully understand the impact and cost to the end investor who will bear the full impact of this proposed legislation. The mandate of the proposed legislation should be for the benefit of the individual investors like ourselves. If the costs greatly outweigh the benefit how is this possible? How can someone like myself even attempt to understand the impact with the complexity and legal language of this instrument? Shouldn't citizens and investors like ourselves who are trying to make ends meet have some say in proposed legislation that is supposed to be for our benefit? This is not even possible without presenting the proposal in a concise and clear format with language that the public can understand. I gather it was never the intent or mandate of this proposed instrument to allow public comment. How can this be reasonable or fair when we must pay for the end cost of these rules that are proposed supposedly for our benefit.

I gather the proposed instrument will require insurance so as to protect investors like ourselves. This will only increase the management fees that we will be charged and lower our returns even further. Insurance should never be mandatory except in rare cases. If all veterinarians required clients have insurance before treating their sick pets the only one who would benefit would be the insurance companies at the cost to clients and ultimately substandard care for their pets. What exactly would be the end cost of this insurance passed on to us if this were passed? Should we not have the right to say no to this insurance and expense if we believe the cost outweighs the benefit?

It also appears this proposed instrument would make the mutual fund industry less efficient by increasing the requirement for working capital. This would stifle the small/boutique mutual funds that we have chosen to invest in and that often provide better returns and would ultimately result in less competition in the industry with only very large mutual fund firms and financial institutions surviving. Ultimately the end investor like ourselves will bear the negative impact of less competition.

I urge you to consider the impact on small investors like ourselves before imposing more costs onto us in the form of greater bureaucracy that don't result in a commensurate benefit. Citizens and investors like ourselves must pay all these costs of not only the end result of the proposed legislation but also the bureaucrats and the process of developing more legislation that is supposed to be for our benefit.

Sincerely

Dr. Kevin S. Plaxton, D.V.M., M.B.A.

Mrs. Carmela Tedesco