



Glenidan Consultancy Ltd.

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Securities 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

c/o Mr. John Stephenson
Secretary
Ontario Securities Commission
20 Queen Street West
Suite 1900, Box 55
Toronto, Ontario
M5H 3S8

Madame Anne -Marie Beaudoin
Corporate Secretary
Autorite des marches financiers
800, square Victoria, 22e etage
C.P. 246, tour de la Bourse
Montreal, Québec
H4Z 1G3

May 1, 2008

Dear Sirs/ Mesdames:

I have read the Proposed Repeal and Replacement of Multilateral Instrument 52-109 *Certification of Disclosure in Issuers' Annual and Interim Filings* dated April 18th, 2008.

I have the following two observations in regard to these Enhanced Internal Control Reporting Requirements.

My first observation regards National Instrument 52-109 *Certification of Disclosure in Issuers' Annual and Interim Filings* (the Proposed Instrument). The Proposed Instrument suggests that it is acceptable for an issuer to disclose material weaknesses without a plan to address such weaknesses. If there is a reasonable probability that a material misstatement will not be prevented or detected on a timely basis I would expect that management should have a plan to address the matter. Otherwise I would not expect the external auditor to issue an unreserved opinion on the financial statements of the issuer.

My second observation regards Form 52-109F1. Paragraph 5b) refers to GAAP (generally accepted accounting principles). As a result of Canada's convergence to International Financial Reporting Standards perhaps this paragraph should refer to "accounting standards".

Regards,

Philip Maguire, C.A.
Principal,
Glenidan Consultancy