



Suite 2101 – 885 West Georgia Street
Vancouver, B.C. V6C 3E8, Canada
Tel: (604) 689-7842
Fax: (604) 689-5452
www.redbackmining.com

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission
Manitoba Securities Commission
Ontario Securities Commission
Autorité des marchés 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

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

Mme Anne-Marie Beaudoin
Corporate Secretary
Autorité des marchés financiers
800, square Victoria, 22e étage
C.P. 246, tour de la Bourse
Montréal (Québec) H4Z 1G3

June 17, 2008

Dear Mr. Stevenson and Mme. Beaudoin,

Re. Proposed Repeal and Replacement of Multilateral Instrument 52-109

I have reviewed the proposed repeal and replacement of MI52-109. While I believe the current proposed rules provide a reasonable balance between the competing objectives of increased governance and accountability versus increased costs, I have strong reservations regarding the proposed implementation date of December 15, 2008 for the following reasons:

- At the time the initial proposed rules were repealed in March 2007, companies were led to believe that the CSA would have provided adequate notice on a going forward basis to ensure they had ample time to review the impact of any revised proposals. Since then, it has taken the CSA over one year to publish the new proposed rules, and these rules are unlikely to be confirmed and become effective until sometime in the second half of the year. Therefore, the proposed effective implementation date of December 15, 2008 is not in keeping with the expectation of an adequate implementation period.

- I do not believe a company should be asked to deploy resources on a priority basis to address the implementation requirements of new rules until these rules are confirmed as definitive.
- We are quickly approaching mid-year already. Many companies with a December 31 year end will find the time between publication of the definitive rules and the end of the year unreasonably short and inadequate to implement the required changes to the design and documentation of internal controls over financial reporting and then test them for effectiveness. I do not consider this to be a reasonable period of time, particularly for companies with complex, multi jurisdictional operations.
- Companies work within established corporate and operating budgets which, for the 2008 calendar year, would have already been established and approved. The sudden deployment of additional resources will, therefore, put a strain on financial resources, particularly for smaller companies.
- Many companies do not have the internal resources to complete to this project and they will need to engage external consultants. Companies need due process to identify and engage the right third party consultant to ensure this work is done in a planned and efficient manner. This will create unnecessary competition and strain in order to gain the services of qualified third parties that can assist in this process in the short period of three to six months before the end of this calendar year.

I trust you will find these comments useful and respond to them in a constructive way.

Best regards



Alessandro Bitelli
Chief Financial Officer

Red Back Mining Inc.

Suite 2101 – 885 West Georgia Street Vancouver, BC V6C 3E8 Canada
Tel: (604) 689-7842 Fax: (604) 689-5452
Email: redback@namdo.com Website: www.redbackmining.com