



**INDEPENDENT**  
— PLANNING GROUP INC. —

December 2, 2008

Attention: John Stevenson, Secretary  
Ontario Securities Commission  
20 Queen Street West, Suite 1903, Box 55  
Toronto, ON, M5H 3S8

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

Dear Sir/Madame:

**RE: CSA 81-318 Request for Comments on Framework 81-406 Point of Sale Disclosure**

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Thank you for allowing us the opportunity to submit a recommendation for the implementation of Framework 81-406.

Our firm is a mutual fund dealer that is licensed in all provinces. We are members of the ACCP, Federation of Independent Mutual Fund Members, Advocis and IFIC. In addition, members of our senior management regularly participate in industry related working groups.

At this time we wish to lend our support to the response submitted to you by the Investment Funds Institute of Canada (IFIC) in reply to this request for comments. We feel that the timeframe outlined by IFIC is reasonable and hope that you seriously consider the recommendations put forth in their letter dated November 24, 2008.

In addition, may we also comment that with respect to the CSA's proposal that the Fund Facts be produced for each class or series of shares; we wonder if the CSA has considered whether or not this is necessary for a series where there is only one or two differences between series, especially if the differences relate to sales charges or commissions? On this particular topic, we feel that fund managers should have some flexibility to determine if separate Fund Fact sheets are necessary for each series of shares.

If you have any questions regarding this submission, please contact me directly by phone at 613-738-3388 x 221 or by email at [avalenti@joinipg.com](mailto:avalenti@joinipg.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Anne Valenti". The signature is fluid and cursive, with the first name "Anne" being more prominent than the last name "Valenti".

Anne Valenti  
Vice President  
Chief Compliance Officer