

December 19, 2008

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission
Manitoba Securities Commission
Ontario Securities Commission
Autorité des marchés financiers
New Brunswick Securities Commission
Nova Scotia Securities Commission
Office of the Attorney General, Prince Edward Island
Financial Services Regulation Division, Consumer and Commercial Affairs Branch, Department of
Government Services, Newfoundland and Labrador
Registrar of Securities, Government of Yukon
Registrar of Securities, Department of Justice, Government of Northwest Territories
Registrar of Securities, Legal Registries Division Department of Justice, Government of Nunavut

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

Dear Mr. Stevenson,

RE: CSA 81-318 REQUEST FOR COMMENTS ON FRAMEWORK 81-406 POINT OF
SALE DISCLOSURE

Thank you for giving us the opportunity to submit comments on Framework 81-406 Point of sale disclosure for mutual funds and segregated funds.

Mackenzie previously submitted two comment letters to the Joint Forum, dated October 15, 2007 and October 3, 2008. While we're still concerned about the delivery requirements and their potential consequences, we are writing today to support the proposal put forth by the Investment Funds Institute of Canada ("IFIC").

Like IFIC, Mackenzie supports a plain-language, two-page Fund Facts disclosure document that offers investors key information in an accessible and comparable format.

Should the CSA accept IFIC's proposal, Mackenzie will be able to produce and make available our Fund Facts in the timeline set out. We believe that IFIC's phased implementation approach will give the public the benefits of having Fund Facts immediately, and also give the industry some insight into how investors perceive and use Fund Facts.

However, we ask that you take some more time to reconsider the implications of the proposed delivery requirements. We continue to believe that those requirements will narrow the product shelf and create regulatory product arbitrage if disclosure documents and delivery requirements for mutual funds and segregated funds are different from those of other types of securities and investments.

Again, thank you for considering our comments. If you have any questions on our position or on points raised in this letter, please do not hesitate to contact me.

Sincerely,



Charles R. Sims
President and Chief Executive Officer
Mackenzie Financial Corporation

Cc: Ms. Joanne De Laurentiis