



**FINANCIAL**  
CMA COMPANIES

December 23, 2008

Via Email

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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  
Registrar of Securities, Prince Edward Island  
Nova Scotia Securities Commission  
Superintendent of Securities, Newfoundland and Labrador  
Registrar of Securities, Northwest Territories  
Registrar of Securities, Yukon Territory  
Registrar of Securities, Nunavut

C/O

John Stevenson  
Ontario Securities Commission  
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Madame Anne-Marie Beaudoin  
Corporate Secretary  
Autorité des marchés financiers  
Tour de la Bourse  
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Montréal, QC H4Z 1G3

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

Dear Sirs and Mesdames:

MD Funds Management Inc. (MDFM), a fund manager, and MD Management Limited (MDM), a dealer, appreciate the opportunity to comment with respect to Framework 81-406 Point of Sale Disclosure for mutual funds and segregated funds released October 24, 2008.

MDFM and MDM are supportive of the objectives of more meaningful, relevant, useful disclosure to clients. We commend the Canadian Securities Administrators (CSA) for making changes to the 2007 proposal.

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MD Financial refers to the following CMA Holdings Incorporated companies: MD Management Limited, MD Funds Management Inc., MD Private Trust Company, MD Private Investment Management Inc., MD Private Investment Management US Inc., MD Life Insurance Company and MD Insurance Agency Limited.



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We are in general agreement with the comments submitted to the CSA by the Investment Funds Institute of Canada (IFIC). In particular, IFIC's proposal to fast-track the implementation approach by dealing only with the fund fact sheet contents, which would be available on companies' websites in 2009. The delivery details would be worked out afterwards through the consultation process with regulators.

We continue to have concerns with the October 2008 proposal. These include: the timing and method of delivery of the fund fact sheets and associated costs of delivery; cumbersome compliance tracking complications; and, potential client securities/product arbitrage away from mutual funds to other products not requiring the same pre-sale disclosure.

Additionally, we recommend synergies be contemplated by the CSA, whenever possible, across the various regulatory proposals such as the Registration Reform (NI 31-103) and the Client Relationship Model.

Yours sincerely,

Robert Kirwin  
Assistant Vice-President  
Compliance  
MD Funds Management Inc.

David Blanchard  
Chief Compliance Officer  
MD Management Limited