jstevenson@osc.gov.on.ca consultation-en-cours@lautoriet.qc.ca

October 19, 2009

British Columbia Securities Commission Alberta Securities Commission Saskatchewan Financial Services Commission Manitoba Securities Commission Ontario Securities Commission Autorité des marchés financier New Brunswick Securities Commission Registrar of Securities, Prince Edward Island Nova Scotia Securities Commission Superintendent of Securities, Newfoundland & Labrador Registrar of Securities, Northwest Territories Superintendent of Securities, Yukon Territory Registrar of Securities, Nunavut

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

> M^e 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

Dear Sir/Madame:

RE: CSA Notice and Request for Comment on Implementation of Point of Sale Disclosure for Mutual Funds

Thank you for the opportunity to submit comments on the Implementation of Point of Sale Disclosure.

I am a Certified Financial Advisor and am licensed in the provinces of Ontario, Manitoba, Alberta and Quebec. I agree with the support to the responses, comments and recommendations submitted to you by the Investment Funds Institute of Canada (IFIC) dated October 14/09.

I fully agree with and support the IFIC comment letter. In particular, I would like to specifically express my full agreement to the following sections of the IFIC comment letter:

- Delivery Requirements and Operational Efficiency
- Adopting a Feasible Plan for Transition
- Under Section Detailed Comments and Related Recommendations

 * Attachment 2, CSA Question 4 In addition to the IFIC
 recommendations, we ask that additional consideration be given to the procedure and cost involved for implementing a method for dealer firms to track and communicate to fund companies when a client wishes to obtain the Fund Facts along with the trade confirmation, rather than at the time of sale. Trade confirmations are sent to the client by fund companies, for client name accounts. ESG requirements may be required to allow for XML tags to be sent to fund companies along with the purchase order.

In addition, with regards to Compliance Tracking of the delivery & receipt of the Fund Facts disclosure, I ask for clarification as to who is responsible to monitor delivery of Fund Facts for segregated fund purchases? Segregated funds are an insurance product/policy and as a life licensed individual I am regulation regulated by FSCO.

I hope that consideration will be given to the comments received on the Point of Sale Disclosure initiative, as the policy will greatly impact my clients and I. If clients best interest is to remain the focal point of all advisor/client relationships, it is not helpful to insist that the client pay more or be forced to look at other investment options that may not be in the client's best interest.

For clarification, please contact me directly by phone at 613-238-7818 or by email at <u>ron@ipgottawacentral.ca</u>.

Sincerely,

Ronald P. Harvey, B. Comm., CGA, CFP