

January 14, 2010

British Columbia Securities Commission  
Alberta Securities Commission  
Saskatchewan Financial Services Commission – Securities Division  
Manitoba Securities Commission  
Ontario Securities Commission  
Superintendent of Securities, Prince Edward Island  
Nova Scotia Securities Commission  
Financial Services Regulation Division, Department of Government Services, Newfoundland and Labrador  
Superintendent of Securities, Northwest Territories  
Superintendent of Securities, Yukon Territory  
Superintendent of Securities, Nunavut

c/o  
John Stevenson, Secretary  
Ontario Securities Commission  
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Toronto, Ontario M5H 3S8  
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Dear Mr. Stevenson,

We are pleased to comment on the Canadian Securities Administrators' (CSA) proposed amendments to the following securities legislation arising from the upcoming changeover to International Financial Reporting Standards (IFRS or IFRS-IASB):

National Instrument 81-106 *Investment Fund Continuous Disclosure*, and  
Companion Policy 81-106CP *Investment Fund Continuous Disclosure*.

We believe that information about the fair value of investments by investment companies is meaningful to investors and other stakeholders. We believe that the importance of such information to users of financial statements of investment companies was well-articulated by the comment letters on Exposure Draft 10, *Consolidated Financial Statements* submitted to the International Accounting Standards Board (IASB).

We understand that the IASB intends to consider this issue during its deliberations with the FASB in February or March of 2010 as part of their joint project on consolidation. We are hopeful that the outcome will be a requirement that investments by investment companies be measured at fair value, rather than through consolidation. If this does not occur, we believe further research should be conducted to determine whether IFRS is a reporting framework commonly used by investment companies in other jurisdictions around the world and how other regulatory regimes have dealt with this issue, in order to determine how best to proceed in Canada.

If the IASB's consolidation project does result in fair value measurement of investments by investment companies, but is not available for adoption in 2011, we would also encourage consideration of whether it is appropriate to defer IFRS adoption for such issuers.

We considered whether we would be able to issue audit reports that would accommodate the various alternatives provided in the Notice and Request for Comments. We believe this would be a common and significant public interest issue and that consultation and coordination with the Canadian Auditing and Assurance Standards Board (AASB) on this issue would be advisable. We understand that a new AASB Task Force on Audit Reporting Implications of the New Canadian Auditing Standards is being formed, which could be an appropriate forum for initial consideration.

We would be pleased to respond to any questions you might have. Questions can be addressed to James S. Saloman (james.s.saloman@ca.pwc.com or 416-941-8249), Douglas C. Isaac (douglas.c.isaac@ca.pwc.com or 604-806-7710) or Scott Bandura (scott.bandura@ca.pwc.com or 403-509-6659).

Yours very truly,

*PriceWaterhouseCoopers LLP*