



RBC Dominion Securities Inc.
155 Wellington Street
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Toronto, Ontario
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Via email

August 30, 2010

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Financial Services Commission – Securities Division
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, Northwest Territories
Superintendent of Securities, Yukon Territory
Superintendent of Securities, Nunavut

c/o John Stevenson
Secretary, Ontario Securities Commission
20 Queen Street West
19th Floor, Box 55
Toronto, Ontario M5H 3S8

and

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/Madam,

Re: Proposed Amendments to National Instrument 54-101, Communication with Beneficial Owners of Securities of a Reporting Issuer (NI 54-101)

We are writing on behalf of RBC Dominion Securities Inc. (RBC DS) in response to the request for comments issued by the Canadian Securities Administrators (CSA) on the proposed amendments to NI 54-101. We appreciate the opportunity to provide comments on the proposed changes to NI 54-101.

RBC DS believes NI 54-101 should ensure that the system for communication with securityholders operates efficiently and reliably for the benefit of clients while at the same time respecting the privacy of clients.

That being said, during the course of 2008 and 2009, RBC DS participated in industry working groups organized by the CSA to discuss important issues affecting securityholder communications and voting in Canada. In addition, RBC DS also participated in the industry working group organized by the Investment Industry Association of Canada (IIAC) and contributed to the comments in the IIAC's comment letter. In this regard, RBC DS fully supports and endorses the comments in the letter submitted by the IIAC.

Thank you for providing us with the opportunity to provide comments on NI 54-101. We would welcome the opportunity to discuss making communications with securityholders more efficient and reliable in further detail. If you have any questions or require further information, please do not hesitate to contact the undersigned.

Sincerely,

RBC DOMINION SECURITIES INC.

“Catherine Patterson”

Managing Director and Vice President, Canadian Wealth Management Operations

cc: Julie Badurina, Associate Director, Wealth Management and Capital Markets, Compliance
Nevio Rafaelic, Director, Canadian Wealth Management Operations