



October 10, 2011

Alex Poole
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 Alberta Securities Commission
 Suite 600, 250-5th Street SW
 Calgary, Alberta T2P 0R4

Re: Proposed Amendments to National Instrument 41-101

Mr. Poole,

This letter regards 'Summary of Key Proposed Amendments' paragraph (g) - Non-Issuer's Submission to the Jurisdiction and Appointment of Agent for Service. Specifically, I address the potential further extension of the filing requirement to foreign experts.


The proposal appears to be unnecessary and redundant. Universally, qualified persons are vetted through professional organizations (AusIMM, SME, etc.) and/or regulatory boards (State Engineer's offices, Geological Boards of Registration). As such, jurisdictional mechanisms already are in place. A formal complaint to a professional organization can impact one's standing as a qualified person. A complaint to a state engineering or scientific board is received with substantial gravity. Those boards have the most significant and often final say on the practitioner's ability to practice under law.

If the CSA forces a practitioner to employ Canadian attorneys and bureaucrats in the conduct of business, the essential effect may be to restrict foreign practitioners from formally considering NI protocols when on projects in their own countries or anywhere outside of Canada. Considering submission to foreign jurisdiction should immediately require the qualified person to confirm whether that is legal in the person's own jurisdiction. As a minimum, that adds attorney costs to an otherwise straightforward technical practice. In large, it may significantly reduce foreign qualified persons presenting technical information to investment opportunities on Canadian exchanges. Is that a desirable end? Eventually, matters may progress to the point where the industry perceives NI documents as insular and simply the toll to operate on Canadian exchanges, not the hallmark of professionalism which was in the original perception.

If the CSA desires to efficiently address professionalism of qualified persons, use the mechanisms already in place and deal directly with the licensing and chartering boards. Reciprocity exists and readily can be strengthened. Additionally, CSA should be able to rely on provincial boards to interpret and transmit the technical case to the foreign jurisdiction. That keeps the entire matter under the purview of technically competent persons rather than turning it over to legal personnel who predominately must still rely on technical personnel.

I appreciate your efforts to pursue professional involvement in the affairs of CSA. Thank you for the opportunity to present these thoughts.

Respectfully,


 Ralph R. Sacrison, B.A., M.S., P.E.
 Principal

