



Suite 200, 8338 120 Street, Surrey, British Columbia V3W 3N4 Office: (604) 443 5059 Fax: (604) 592 6882

July 11, 2013

CANADIAN SECURITIES ADMINISTRATORS C/O:

Anne-Marie Beudoin, Corporate Secretary
Autorite des marchés financiers
Tour de la Bourse 800, square Victoria
C.P. 246, 22e étage
Montreal, Quebec H4Z 1G3
Fax: (514) 864-6381

AND

The Secretary
Ontario Securities commission
20 Queen Street West
Suite 1900, Box 55
Toronto, Ontario, M5H 3S8
Fax: (416) 593-8145

Dear Mesdames/Sirs:

RE: PROPOSED AMENDMENTS TO
NATIONAL INSTRUMENT 62-103 EARLY WARNING SYSTEM

Thank you for the opportunity to comment on the proposal by the Canadian Securities Administrators to amend the early warning system established in national Instrument 62-103.

The writer has concerns that the proposed changes will materially reduce the capital available to all small to mid-cap companies listed on the Canadian Exchanges.

We submit that the public interest would not be served by implementing the proposals for the following reasons:




Suite 200, 8338 120 Street, Surrey, British Columbia V3W 3N4 Office: (604) 443 5059 Fax: (604) 592 6882

- Small cap companies and even mid-cap ones always face a challenge raising capital because they are relatively young and have fewer net assets and income than larger cap companies – investment is more risky;
- Small cap and most mid-cap size companies cannot afford to have a lawyer available for investors to comply with a more rigorous investor reporting regime; and accordingly, the investor will then have to retain the services of a lawyer to complete the regulatory reporting requirements on their behalf thereby increasing the cost of investment into an already relatively risky venture. and will therefore limit their investment to less than 5%;
- Small and mid-cap size companies create employment and trade in the Canadian services sector and; with less ability to raise capital for the reasons set out above, there will be less employment and less contribution to the Canadian economy;

In summary, we respectfully submit that small cap finance is of great importance to the Canadian securities industry as well as other service industries and this great contribution that is made to the general overall Canadian economy would be greatly impaired if the proposed CSA measures are implemented.

Yours truly,
GRAND PEAK CAPITAL CORP.
Per:



Sonny Janda, President & CEO