

September 23, 2011

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

Mr. John Stevenson, Secretary,
Ontario Securities Commission
E-mail: jstevenson@osc.gov.on.ca

Me Anne-Marie Beaudoin, Corporate Secretary
Autorité des marchés financiers
E-mail: consultation-en-cours@lautorite.qc.ca

Dear Canadian Securities Administrators,

Subject: Proposed amendments to National Instrument 31-103, Cost Disclosure and Performance Reporting

Highstreet Asset Management Inc. (“Highstreet”) appreciates the opportunity to comment on the proposed amendments and commends the Canadian Securities Administrators (“the CSA”) for seeking improved transparency around cost and performance disclosure associated with investing in capital markets, especially for retail/private clients. Highstreet is registered across Canada as a Portfolio Manager for 3rd party segregated accounts such as pension plans and sub-advisory relationships. We are registered across Canada as an Exempt

Market Dealer and in Ontario as an Investment Fund Manager in order to distribute and manage the Highstreet Pooled Funds.

Application of the proposed amendments

The requirements in proposed section 14.14(5.2)(a) are the domain of the keeper of the book of record and not the advisor. We ask that you exempt from this requirement the same institutions listed in 14.2(5) and any institution that has discretion over custody and where the registrant is not the investment fund manager.

These trusts are independently audited and managed and in some cases have chosen to record book value on a different basis than how we record it on our internal security accounting system. Providing book values to these portfolios provides no added value to our services as an advisor.

This would capture large pension plans and other trusts or corporate clients. These clients generally do not have ‘accounts’ with advisors, but they have agreements that permit an advisor to trade in a custody account which the client has opened.

Frequency of reporting of cost disclosure and performance

Proposed section 14.2(4.1) requires a registered firm to deliver disclosure of charges and performance on an annual basis.

Highstreet has disclosed account charges and performance on a quarterly basis since the firm’s inception. Reporting on a quarterly basis coincides with the transactions that collect the fees and reinvest income. Highstreet would appreciate the latitude to continue on this basis and be in conformity with the rule.

Please consider amending the reporting frequency to “at least annually”. This would permit firms that have been providing this information on a more frequent basis to continue with their established practice.

We thank the CSA for the opportunity to comment on this very important topic.

Yours truly,



Paul A. Brisson
President & CEO