Your file Votre référence

Our file Notre référence

John Mountain The Investment Funds Institute of Canada 151 Younge Street - 5th Floor Toronto ON M5C 2W7

February 3, 2003

Dear Mr. Mountain:

Re: Interest Deductibility

Your facsimile of January 30, 2003, regarding the above-noted subject has been received and assigned to the Corporate Financing Section for reply.

Our policy is to give priority to requests for advance income tax rulings and internal technical interpretation requests. Other requests for technical interpretations will generally be dealt with in the order in which they are received. When work on your request begins a rulings officer will contact you if additional information or clarification is required.

In the meantime, the Section Manager may be contacted at (613) 957-3493. If it is necessary to call or write, please quote the reference number 2003-000082.

Yours truly,

Steve Tevlin

Manager

Corporate Financing Section

Financial Industries Division

Income Tax Rulings Directorate

Policy and Legislation Branch