



21 September 2004

Mr. Mark Davidson
Executive Director
Secretariat on Regulating Immigration Consultants
Citizenship and Immigration Canada
Jean Edmonds South Tower, 20th floor
365 Laurier Avenue West
Ottawa ON K1A 1A1

Dear Mr. Davidson:

Re: "Use of a Representative" form IMM 5476

Thank you for providing a copy of the draft revised form IMM 5476 and instructions (English version only). Most of the changes seem to clarify the form and the Regulations. However, we do have some comments:

1. The instructions suggest that a new form must be submitted with each application. It seems to us that an applicant should be able to appoint the representative to represent the applicant on all applications. Alternatively, we would like confirmation that a copy of the IMM 5476 submitted with the first application is acceptable for submission with subsequent applications.
2. Both the instructions and the form state that an individual may appoint "one representative only" for each application. This is a change from the current practice. It could cause problems in situations, as currently exist, where more than one lawyer is assisting a client on a file, or where a second lawyer in a firm is backing up the authorized representative.

We suggest the instructions be amended to read as follows:

You can appoint **one** representative only for each application you submit, *unless the representatives belong to the same firm, in which case you can appoint two* for each application you submit.

3. There is now a requirement for up to three signatures on one form. In many cases, the three individuals may be in three different parts of the world at any one time. It becomes an administrative nightmare for all three sign the same form and submit it expeditiously, especially if an emergency arises. As is done in commercial transactions where parties are in different locations, we recommend the following comments be added to the form.

This form may be signed in counterparts and a signed form submitted by way of fax, telecopier, or other electronic means is as valid as the original.

We look forward to further discussion with you on this matter.

Yours very truly,

(Original signed by Tamra L. Thomson for Wendy Danson)

Wendy Danson
Chair
National Citizenship and Immigration Law Section.