inventions of science and developments of the national life extend the significance of such phrases beyond what they comprehended when the Constitution was originally framed. Thus, in *Pensacola Telegraph Co.* v. *Western Union Telegraph Co.* (1877), 96 U.S. 1, the power of the Congress of the United States to regulate commerce with foreign nations, and among the several states, and with the Indian tribes was held not confined to the instrumentalities of commerce as they were known and used when the constitution was adopted. As the Court says: "It keeps pace with the progress of the country and adapts itself to the new developments of times and circumstances. It extended from the horse with its rider to the stage coach, from the sailing vessel to the steamboat, from the coach and the steamboat to the railroad, and from the railroad to the telegraph, as these new agencies are successfully brought into use to meet the demands of increasing population and wealth."

In annotating the principal case, we must not overlook the contribution which Duff, J., makes to the knotty point of what constitutes a "public harbour" within sec. 108 of the Federation Act. After quoting some words of Lord Esher, in *Regina* v. *Hannam*, 2 Times L.R. 235, and referring to some observations of Lords Herschell and Watson, reported as occurring on the argument before the Privy Council in the *Fisheries Case*, [1898] A.C. 700, he says: "In *Atty.-Gen.* v. *Can. Pac. R. Co.*, [1906] A.C. 204, it was assumed that it was necessary to shew user for commercial purposes as distinguished from purposes of navigation merely. Generally speaking, I think such user must be shewn, in the absence of some evidence of recognition by competent public authority of the locality in controversy as a harbour in a commercial sense. *The King* v. *Bradburn*, 14 Can. Ex. 419. As to the extent of the commercial user necessary to bring a given locality within the description 'public harbour' a variety of circumstances may, no doubt, affect the determination of that decision."

B.C.] BALL v. ROYAL BANK OF CANADA. [Nov. 29, 1915.

Banking—Purchase of company's assets—Bill of sale—Description of chattels—B.C. Bills of Sale Act, R.S.B.C., 1911, ch. 20—Registration—Recital in bill of sale—Consideration—Defeasance—Reference to unregistered note—Collateral security—Loan by bank—Bank Act, 3 & 4 Geo. V. ch. 9, sec. 76.

Under the British Columbia Bills of Sale Act, R.S.B.C., 1911, ch. 20, any description by which the goods affected by a bill of sale can be identified is formally sufficient, as the Act does not require specific description of the chattels comprised therein.

A bill of sale given as security for the payment of a promissory note contained recitals shewing particulars of the note and that interest was payable on the amount thereof, but the rate of