

- (2) The competent authority of the applicant State shall provide the following information to the competent authority of the requested State when making a request for information under the Convention to demonstrate the foreseeable relevance of the information requested to the administration and enforcement of the tax laws of the applicant State:
- (a) the identity of the person under examination or investigation;
  - (b) a description of the information sought including its nature and the form in which the applicant State wishes to receive the information from the requested State;
  - (c) the tax purpose for which the information is sought;
  - (d) the grounds for believing that the information requested is held in the requested State or is in the possession or control of a person within the jurisdiction of the requested State;
  - (e) to the extent known, the name and address of any person believed to be in possession of the requested information;
  - (f) a statement that the applicant State has pursued all means available in its own territory to obtain the information, except those that would give rise to disproportionate difficulties.

If the foregoing understanding meets with the approval of the Government of Canada, I have the further honour to propose that this Note and your affirmative Note in reply shall constitute an agreement between our Governments which shall become an integral part of the Convention on the date of entry into force of the Protocol.

Please accept, your Excellency, the assurances of my highest consideration."