

mittee. If the desire of our commission was to duplicate the report of the New York committee, that of course was a proper appointment to make, but if the report was to be of an independent character—distinctively Canadian or British—it is difficult to see how any unprejudiced person can consider the appointment as other than a great mistake.

THE DANGER OF THE APPOINTMENT.

"(4) The moment Mr. Dawson's appointment was announced, Canadian insurance men realized the tremendous danger that our Royal Commission would simply run along in the rut made by the Armstrong Committee. About two-thirds of the change in the insurance act suggested in the Canadian report are verbatim extracts from the Armstrong law.

A REMARKABLE COINCIDENCE.

"(5) Mr. Dawson claims that, though the Canadian commissioners made recommendations similar to those of the Armstrong Committee, that was their own doing, and he must not be held responsible. His explanation of the striking resemblance is, 'same evils, same remedy.' According to Mr. Dawson, the fact that the two committees of which he was adviser—those of New York and Canada—thought along similar lines was a mere coincidence! Who would suppose that his pet 'remedy,' which he specially recommends even in this letter, and which he considers so self-evident, has been already rejected by such States as Massachusetts, Pennsylvania, New Jersey, Colorado and Michigan, and that the special committee on life assurance of the House of Lords in Great Britain also failed to recommend it? Who would suppose that Mr. Dawson himself is almost its only expert advocate except an occasional officer of some company which would like to see its rival brought under the same restrictions as itself?

MR. DAWSON'S ZEAL.

"(6) Mr. Dawson's attitude towards the Armstrong law is a curious endeavour to run with the hare and hunt with the hounds. He treats as an insult the suggestion that he assisted in fastening that legislation upon New York, and terms it 'pure wilful mendacity.' To Canadians it is a matter of complete indifference whether Mr. Dawson originated the Armstrong restrictions, or merely became a convert to them. It is enough to know that at the time of his appointment as expert adviser of the Canadian commission, and ever since, he has been a vehement advocate of them.

THAT APPEAL TO NEW YORK COMPANIES.

"(7) Mr. Dawson claims that he did not urge the New York companies to use their utmost efforts to have similar legislation passed in the other States, appealing to their selfish interests by pointing out that if they were handicapped while their rivals were not, they would be unable to compete successfully with them. He says that what he desired was their support of his "select and ultimate" method of valuing policies. It is true that he did appeal to them on the latter point, but he certainly also appealed vigorously for their support in regard to legal restrictions. Though Mr. Dawson's

memory has failed him at this point, there would be no difficulty in obtaining a score of witnesses to prove that he made this appeal, for it was made to a large meeting.

MR. DAWSON IGNORED.

"(8) Mr. Dawson claims that his advice was sought by our commissioners in regard to one point only—the method of valuation—and that in other respects the recommendations of the commissioners were absolutely their own. In that event the commissioners certainly did not pay Mr. Dawson the compliment of setting a high value on his opinions. To do Mr. Dawson justice, there is every indication in the report that, although he had much to do in forming the general opinions of the commissioners, and in shaping the general character of their report, their actual recommendations were prepared absolutely without assistance from any person who understood life insurance. Mr. Dawson's views are peculiar and radical, but no insurance man finds it difficult to believe that neither he nor any other expert had anything to do with the bill proposed by the commissioners. It would be easy for inexperienced gentlemen to make voluminous extracts from the Armstrong law, with such alterations as they might think desirable, and this apparently was exactly what was done. The original parts are original—very, very original.

THE EASY ROAD.

"(9) The fact apparently is that our commissioners and their counsel, when faced with this difficult problem, succumbed to the temptation to merely follow the path already beaten by the New York committee. An independent actuary might have assisted them to strike out on an independent course.

THE CANADIAN MANAGERS.

"(10) The Canadian managers realized that it was impossible for any three gentlemen, without technical knowledge, to draft a satisfactory code on life insurance. The Manager's Association offered their co-operation, and gave very earnest consideration at a long series of meetings to the questions involved, finally making a number of unanimous and important recommendations. At the close of their meetings these gentlemen congratulated each other on having been able to agree upon legislation which would, they were convinced, give Canada the best insurance laws in the world. To their amazement and disgust neither their recommendations nor the opinions of Mr. George King, F.I.A., the great English expert, which had been obtained from the commissioners with much trouble and expense, were even printed in the report. Who was responsible for this—the commissioners, their counsel, or Mr. Dawson?

MR. DAWSON'S UNFAIRNESS.

"(11) I may point out that Mr. Dawson's charge that Canadian companies are more extravagant than those investigated by the Armstrong Committee is founded upon an utterly misleading basis of comparison. Loadings are the sums by which the gross premiums collected exceed the net mathematical premiums. Companies which charge low premiums have smaller loadings than those which