M&G INVESTMENTS

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Date

18 January 2005

CESR,
11-13 avenue de Friedland
75008 PARIS
FRANCE

Dear Sir

CESR's Draft Technical Advice on Possible implementing Measures of the Directive 2004/39/EC on Markets in Financial Instruments. 2nd set of Mandates.

M&G Investment Management (MAGIM), an institutional manager based in the UK managing £134BN, is pleased to comment on question 7.2 of the October 2004 consultation in respect of the above.

Question 7.2
Display of client limit orders Article 22.2
Do you consider the proposal on publishing client limit orders in a quote driven system appropriate?
Answer
We feel that such a rule would be against our customers' interests. At present we use Brokers to transact open orders in illiquid stocks on a piecemeal basis in order to achieve the best possible price for our client. If we (or they) were forced to reveal to the market the size and desired price of a trade it would adversely affect our ability to implement that trade.

We have no comments on any other questions.

We would be happy to discuss any of our issues with CESR.

Yours faithfully

James A Hudson
Senior Manager Compliance.

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