



INVESTMENT INDUSTRY ASSOCIATION OF CANADA
ASSOCIATION CANADIENNE DU COMMERCE DES VALEURS MOBILIÈRES

Barbara Amsden
Director, Capital Markets
Tel: (416) 687-5476
E-mail: bamsden@iiac.ca

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Mr. Thomas Chillemi
QI Program Manager
Internal Revenue Service (IRS)
290 Broadway
New York City, New York
10007 U.S.A.
Tel: 1 (212) 298-2101
E-mail: thomas.chillemi@irs.gov

Dear Mr. Chillemi:

Re: Canadian KYC Attachment

Attached, as discussed with representatives of the Canadian community and promised in our September 2006 letter to the IRS, are the following documents that set out the forms of identification that we believe should be added to the Attachment for Canada for know-your-customer (KYC) purposes (Canadian Attachment).

1. Marked-up copy with the proposed changes shown in "track changes" format
2. A "clean" copy of the same document, with all proposed changes accepted
3. An annotated version, including mark-up changes and footnotes cross-referenced to relevant supporting documentation.

Attached to the hardcopy version of this letter that is to follow by courier are paper versions of legislation, regulations and other supporting documents.

Appended here for your easier reference are electronic references to the new supporting documentation. Similar to the United States, Canada has been strengthening legislation, regulations and procedures to counter money-laundering, acts of terrorism and other criminal activity. As well, our federal and provincial governments have been including new security features in the identification documents that they issue and we expect further improvements and additional identification forms to emerge in time. We appreciate the IRS's willingness to consider making further changes to the Attachment for Canada in the future.

We would be pleased to answer any questions that you may have to achieve the earliest possible update of the Canadian KYC attachment to reflect the broader range of appropriate identification.

Yours truly,



CC:

Mr. Thomas McGrath
Associate Technical Advisor, Qualified Intermediary Program
Badge 13-24510
Internal Revenue Service (IRS)
290 Broadway
NYC, NY 10007 U.S.A.
Tel: (212) 298-2187
Fax: (212) 298-2106
E-Mail: tom.mcgrath@irs.gov

Ms. Karen Michell
Vice-President, Operations
The Canadian Bankers Association
Commerce Court West, 30th Floor
Toronto, Ontario
Canada M5L 1G2
Tel: (416) 362-6093
E-Mail: kmichell@cba.ca

Members of the IIAC QI Committee

References

1. *The Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, updated to September 15, 2006, can be found at <http://laws.justice.gc.ca/en/P-24.501/text.html>
2. *The Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations* can be found at <http://lois.justice.gc.ca/en/P-24.501/SOR-2001-317/164675.html#rid-164683> as the *Proceeds of Crime (Money Laundering) and Terrorist Financing Suspicious Transaction Reporting Regulations* (2.a); <http://laws.justice.gc.ca/en/P-24.501/SOR-2002-184/text.html> as the *Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations* (2.b); and <http://laws.justice.gc.ca/en/P-24.501/SOR-2002-412/index.html> as the *Cross-border Currency and Monetary Instruments Reporting Regulations* (2.c)
3. Refer Section 4 of “Guideline 6E: Recordkeeping and Client Identification for Securities Dealers (June 2005),” found at the Financial Transactions and Reports Analysis of Canada website at http://www.fintrac.gc.ca/publications/guide/guide6/6e_e.pdf
4. For the Canadian citizenship card, refer to the Overview and the Documents You Must Send sections of the publication at <http://www.cic.gc.ca/english/pdf/kits/citizen/0001E.pdf>
5. For information on the Permanent Resident Card, see <http://www.cic.gc.ca/english/pub/fs-prc.html> (5.a) and <http://www.cic.gc.ca/english/pr-card/index.html> (5.a)
6. For the Canadian Forces Identification Card issued by the Canadian Department of National Defence, NDI – 20, refer to the attached Primary Identification Cards document (5.a) issued by the Department of National Defence and application (http://www.army.forces.gc.ca/Exviiqilantguardian/documents/soldiers/App_Perm_ID_Card.doc)
7. For information on the Certificate of Indian Status Card, refer to http://www.ainc-inac.gc.ca/gol-ged/faq_e.html
8. For the Alberta Photo Identification Card, see: <http://www3.gov.ab.ca/gs/driverslicence/documents.html>
9. For the B.C. Identification card, see: <http://www.qp.gov.bc.ca/statreg/reg/m/motorvehicle/465%5F88.htm> (9.a), http://www.icbc.com/licensing/lic_utility_id_cardpu.asp (9.b) and http://healthnet.hnet.bc.ca/hds/approved_standards/document.html#primary_doc (9.c)
10. For the Government of Newfoundland and Labrador Photo Identification Card (ID Card), see: <http://www.gov.nf.ca/gs/gs/mr/photo-id.stm>
11. For the Nova Scotia Photo Identification Card, see: <http://www.gov.ns.ca/snsmr/RMV/other/idcard.asp>
12. For the Prince Edward Island Voluntary ID, see: http://www.gov.pe.ca/photos/original/tpw_valid.pdf
13. For the Saskatchewan identification card, refer to the Saskatchewan Government Insurance website at http://www.sgi.sk.ca/sgi_pub/drivers_licences/photo_id.htm (13.a) and http://www.sgi.sk.ca/sgi_pub/drivers_licences/new_residents.htm (13.b)