



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

[www.iiac.ca](http://www.iiac.ca)

July 24, 2020

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M<sup>e</sup> Alexandre Normandeau  
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M<sup>e</sup> Philippe Lebel  
Corporate Secretary and Executive Director, Legal Affairs  
Autorité des marchés financiers  
Place de la Cité, tour Cominar  
2640 Laurier boulevard, suite 400  
Québec, Québec G1V 5C1

Dear M<sup>e</sup> Normandeau and M<sup>e</sup> Lebel,

**Re: Bourse de Montréal Inc. – Request for comments - Amendments to Article 12.5 of the Rules of Bourse de Montreal Inc. to Modify the Minimum Price Fluctuation of the Three-Month Canadian Bankers’ Acceptance Futures**

The Investment Industry Association of Canada (the "IIAC") and its members would like to take this opportunity to express their views on the proposed amendments (the "Proposal") to the Rules (the "Rules") of Bourse de Montréal Inc. (the "Bourse") regarding amendments to the minimum price fluctuation of the Three-Month Canadian Bankers’ Acceptance Futures ("BAX") as per Circular 113-20 (the "Circular") issued on June 25, 2020.

The IIAC is the national association representing the position of 115 IIROC-regulated dealer member firms on securities regulation, public policy and industry issues. We work to foster a vibrant, prosperous investment industry driven by strong and efficient capital markets.

We remind Bourse de Montréal Inc. that this comment letter, in its entirety, can be published on the Bourse's website.

### **Proposed Amendments**

As stated in the Circular:

*The Bourse proposes to amend the minimum price fluctuation (tick size) of the BAX contract within article 12.5 of its Rules such that the minimum price fluctuation for the ninth, tenth, eleventh and twelfth quarterly BAX contract months be reduced by half, from 0.01 index points (a full tick) to 0.005 index points (a half tick). Therefore, the minimum price fluctuation for all the listed contract months (including serials) would be 0.005, representing \$12.50 per contract.*

### **Position of the Industry**

The IIAC and its members do not oppose the Proposal.

Please note that the IIAC and its members, as always, remain available for further consultations.

Yours sincerely,



Annie Sinigagliese  
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