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Shuaib Shariff
Senior Vice President, Finance and Administration
Investment Industry Regulatory Organization of Canada
121 King Street West, Suite 2000
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February 2, 2018

Dear Mr. Shariff:

Re: Proposed Amendment to the Minimum Dealer Regulation Fee Component of the Dealer Member Fee Model (the “Fee Proposals”)

The Investment Industry Association of Canada (the “IIAC” or “Association”) appreciates the opportunity to provide comments on the Fee Proposals.

IIROC staff members made a helpful presentation to the IIAC Small and Independent Dealers Committee on December 13, 2017, outlining the features and rationale behind the Fee Proposals. Subsequent to that meeting, IIAC members met to discuss the information presented and the content in the IIROC Request for Comments dated December 21, 2017.

The IIAC appreciates the rigorous analysis supporting the Fee Proposals, which clearly demonstrates the financial impact that the changes to the fee calculation will have on member firms. The detailed examination of the effects of the Fee Proposals demonstrates that the new approach achieves IIROC’s objectives without imposing unintended negative consequences on the industry.

The Association supports the rationale, and the approach taken in the development of the Fee Proposals. We believe they address the shortcomings of the existing fee calculation, as articulated in the Notice, which include volatility, lack of predictability and unfairness.

The IIAC Small and Independent Dealer Committee appreciates that IIROC sought out its input on this matter. We would be pleased to provide feedback on other matters affecting this sector of the industry.

Thank you for considering our comments. If you have any questions, please don't hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Copland', written in a cursive style.

Susan Copland