

March 6, 2018

BY EMAIL TO: comments@osc.gov.on.ca

Grace Knakowski
Ontario Securities Commission 20 Queen Street West
22nd Floor Toronto, ON M5H 3S8


Dear Ms. Knakowski:

Re: Request for comments regarding changes to OSC Policy 15-601 – In-house counsel eligibility for whistleblowing awards

We are writing in response to the Ontario Security Commission's request for comments regarding a proposed change to OSC Policy 15-601 *Whistleblower Program*. For the Centre for Free Expression at Ryerson University, whistleblower protection is major focus.

The issue with which you are dealing is an important one. As we were preparing our comments, Peter Jacobsen and Abbas Kassam shared with us their firm's submission to you (see attached). We find that their submission captures what we wish to say so we simply want to endorse their comments, the concern they expressed, as well as their recommendation that the OSC provide more detailed guidance as to when in-house counsel would be eligible for the whistleblowing award.

Sincerely,



James L. Turk
Director

cc: Peter Jacobsen
Abbas Kassam
Ange Holmes