

The Secretary
Ontario Securities Commission
20 Queen Street West
22nd Floor, Box 55
Toronto, Ontario M5H 3S8
Fax: 416-593-2318
comments@osc.gov.on.ca

Dear Sir/Madame :

Re : Proposed Amendments to National Instrument 31-103

I am writing in regard to “Client Focused Reforms – Proposed Amendments to National Instrument 31-103 and Companion Policy 31-103”, released by the Canadian Securities Administrators on June 21, 2018.

I am a consultant working in the field of securities firm compliance in British Columbia.

It has been brought to my attention by the Private Capital Markets Association of Canada, and by one of my clients, that a particular proposed amendment has not been much discussed over the course of the NI31-103 reform process. I refer to the major revision of section 13.8 to require that any person receiving a referral fee must also be a registrant (along with the firm receiving the referred client).

This is, of course, a substantial change to current practice in which business associates of registrants can refer clients and receive fees, without having a registration themselves.

The comment deadline for the Proposed Amendments is today (October 19, 2018). Please count this letter as a comment or submission received in support of an extension of time of the comment process for the changes to section 13.8. I do not believe that registrants have been given enough time to understand the impact of this particular change and to make submissions to the CSA.

Sincerely,

(signed)

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