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September 27, 2010

John Stevenson, Secretary  
Ontario Securities Commission  
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John,

**Re: Proposed Amendments to National Instrument 33-109 and Related Forms.**

We are writing to provide a comment of the Registration Department of Canadian Imperial Bank of Commerce ("CIBC") with respect Form 33-109F4.

We suggest modifying SCHEDULE G to Form 33-109F4 as follows:

**2. Firm information**

Check here if this activity is employment with your sponsoring firm.

If the activity is with your sponsoring firm and under the immediate supervision of the branch manager of the location of employment provided in Item 9 #1, you are not required to indicate the firm name ~~and~~, address and supervisor information below:

Name of business or employer: \_\_\_\_\_

Address of business or employer: \_\_\_\_\_  
(number, street, city, province, territory or state, country)

Name and title of your immediate supervisor: \_\_\_\_\_

**Rationale**

In many cases the applicant's immediate supervisor at their sponsoring firm is their branch manager, i.e. the branch manager of their registered employment location. Under these circumstances, since the applicant's location of employment has already been disclosed in Item 9 of Form 33-109F4 it is unnecessary to identify that individual again in Schedule G. Only in those particular circumstances where the applicant's immediate supervisory at their sponsoring firm was not the branch manager of their location of employment would disclosure of that supervisor's name be required in Schedule G.

Thank you for the opportunity to provide our comments. Please address any questions or comments to:

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