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Murray J. Taylor
Co-President and Chief Executive Officer

December 11, 2014

Market Regulation Branch
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Colin Yao, Legal Counsel, Regulatory Affairs (Equity Trading)
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Dear Sirs/Mesdames:

Re: OSC Staff Notice Regarding Alpha Exchange Inc. Notice of Proposed Rule Amendments and Request for Comments

We are writing in respect of OSC Staff Notice and Request for Comment published on October 23, 2014 regarding proposed rule amendments to the TSX Alpha Exchange Trading Policies ("the Notice"). We appreciate the Commission's Staff Notice and the opportunity for market participants to provide their views and inputs on certain proposed structural changes impacting the Canadian marketplace. We note the OSC put forward no specific questions on proposed features or their potential outcomes in the notice.

IGM Financial Inc. ("IGM") is a diversified financial services provider that operates through its business units Investors Group Inc., Mackenzie Inc. and Investment Planning Counsel Inc. and their respective subsidiaries. Principal subsidiaries include registered portfolio managers I.G. Investment Management, Ltd. and Mackenzie Financial Corporation, and mutual fund dealer Investors Group Financial Services Inc. Collectively the registered portfolio managers provide advice on approximately \$39 billion in Canadian traded securities and, as such, are a dominant and long term participant in the Canadian equity market and have a vested interest in fair, efficient and effective marketplaces.

IGM is a founding investor in Aequitas Innovations Inc., which offered IGM an opportunity alongside other significant market participants to develop and support an alternative and competitive stock exchange. Our strategic involvement is based on serving the interests of our millions of Canadian clients

We welcome competition and accept that innovation and the evolution of existing business models is a healthy process. However, structural changes in the Canadian marketplace that can be viewed as only continuing to foster those activities that are not in the long-term interests of Canadian clients, need to be thoroughly discussed and reviewed.

We acknowledge that, given the current structure of the Canadian marketplace, inefficiencies are leading to a flow of retail orders being directed to U.S. wholesale market makers. While we believe that the alternative being offered through the Aequitas Neo exchange will help to address this concern, the proposal by the TMX has many consequences, which in our view, are undesirable and will only further support the types of activities Aequitas Innovations Inc. was designed to discourage.

In particular, we have reservations regarding key features of the proposal that we believe would have a significant impact on the attractiveness of the Alpha marketplace to institutional long-term investors. Specifically, the exclusion of the application of a "speed bump" to order types designated "post only" in a marketplace that applies a "speed bump" to all other market orders types will have a negative impact on price discovery and large order transactional volume.

Under the Alpha proposal, "post only" order types (which sit at the front of the queue) can be cancelled, without any delay, if market conditions change. Within the current market structure, large institutional orders need to access all market venues, none of which have speed bumps that impact these order types. As the other parts of large orders are being executed on other exchanges they will provide a signal to Alpha "post only" orders (which are excluded from the application of a speed bump) that there is potentially large order size thereby giving the "post only" order an opportunity to cancel and/or re-price.

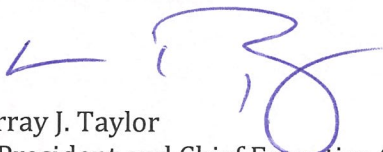
This different treatment to "post only" orders serves to protect those whose activities may be counter to the purposes of a marketplace and will further encourage rapid posting and cancellation of orders further impacting liquidity, price discovery and inequality among market participants. In effect, we see the proposal as leading to a segregation of trading activity between retail and institutional clients with obvious market quality issues arising.

In summary, the Alpha proposal protects order types used by High Frequency Traders and will further promote internalization, over intermediation and segregation of retail and institutional order flow.

We appreciate having this opportunity to share our views regarding the Notice and would be pleased to discuss these comments with you at your convenience. If you would like to do so, please contact Jeff Carney or myself.

Yours truly,

IGM Financial Inc.



Murray J. Taylor
Co-President and Chief Executive Officer

cc: Jeffrey Carney, Co-President and Chief Executive Officer