



Federation of Mutual Fund Dealers
Fédération des courtiers en fonds mutuels

December 8th 2014

VIA E-MAIL ONLY

The Cooperative Capital Markets Regulatory System
The Governments of British Columbia, Ontario, Saskatchewan, Prince Edward Island
and New Brunswick, represented by their Ministers of Finance, and
The Government of Canada, represented by the Minister of Finance of Canada
commentonlegislation@ccmr-ocrmc.ca

To Whom It May Concern:

Re: Comments on the Consultation Draft Provincial Capital Markets Act (PCMA) and
Capital Markets Stability Act (CMSA)

The Federation of Mutual Fund Dealers (the “Federation”) is an association of Canadian mutual fund dealers and industry participants. Since 1996, the Federation has been working to strengthen the mutual fund industry in Canada. The Federation represents dealer firms with over \$150 billion of assets under administration and more than 14,000 licensed advisors who provide financial services to over 3.5 million Canadians and their families. Affiliate Members have a keen interest in our industry’s activities and bring valuable perspective to the table. Mutual fund dealers must maintain a strong and united voice in this changing business environment. Our mandate is to ensure that your interests are clearly represented to regulators and government bodies.

The Federation has been monitoring the efforts of the Canadian Securities Transition Office and note now the development of the Cooperative Capital Markets Regulatory System (the “System”). A tremendous amount of information was published in September, with a further publication in October, and while we appreciate the opportunity to comment, even with the extension to a 90-day comment period this is a short time period for such an important initiative.

This letter therefore is brief. While we in principal support the concept put forward by the System, we continue to have concerns about the abundant layers of regulation in Canada which this does not appear to address except to add to; we wonder where the efficiencies will be found for the financial services industry; we are concerned about how the mutual fund dealer channel, that has seen a tremendous amount of change over the last dozen years will fair; and, what the ultimate governance of the regime will look like.

We will continue to analyse the information published thus far, would encourage your office to provide longer consultation periods, and to add in-person public consultations going forward.



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We appreciate the opportunity to comment and look forward to weighing in on future consultation publications.

Regards,

Federation of Mutual Fund Dealers



Sandra L. Kegie
Executive Director