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BY EMAIL

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Dear Sirs/Mesdames:

Re: **CSA Staff Notice 23-322 *Trading Fee Rebate Pilot Study* (the “Staff Notice”)**

The Canadian Advocacy Council¹ for Canadian CFA Institute² Societies (the CAC) appreciates the opportunity to provide comments on a potential Canadian pilot study as referenced in the Staff Notice.

We would support a Canadian pilot study regarding the impact of transaction fees and rebates on order routing behavior, execution quality and market quality in coordination with the study proposed by the United States Securities and Exchange Commission (the “SEC”), which if implemented following a 60-day comment period, would place pricing restrictions across different groups of eligible securities for a period of two years.

¹The CAC represents more than 15,000 Canadian members of CFA Institute and its 12 Member Societies across Canada. The CAC membership includes portfolio managers, analysts and other investment professionals in Canada who review regulatory, legislative, and standard setting developments affecting investors, investment professionals, and the capital markets in Canada. See the CAC's website at <http://www.cfasociety.org/cac>. Our Code of Ethics and Standards of Professional Conduct can be found at <http://www.cfainstitute.org/ethics/codes/ethics/Pages/index.aspx>.

² CFA Institute is the global association of investment professionals that sets the standard for professional excellence and credentials. The organization is a champion for ethical behavior in investment markets and a respected source of knowledge in the global financial community. The end goal: to create an environment where investors' interests come first, markets function at their best, and economies grow. CFA Institute has more than 155,000 members in 165 countries, including more than 148,900 CFA charterholders and 149 member societies. For more information, visit www.cfainstitute.org.

In 2014, we supported the CSA's efforts in reviewing the regime regarding the Order Protection Rule and trading fees and data fees. We remain supportive of similar initiatives. We recognize that concerns were expressed with respect to starting a Canadian pilot study in the absence of a similar study in the United States, given the risks to the Canadian marketplaces and the liquidity concerns in relation to issuers whose securities are interlisted in Canada and the United States.

In light of the SEC's recent proposed study, we urge the CSA to explore the possibility of a Canadian pilot study in concert with the SEC in order to better understand and effectively deal with transaction fee pricing, including rebates. Since the Canadian capital markets are closely interconnected with those of the United States, it is important that any Canadian pilot study be undertaken concurrently with the U.S. study and thus proposals be published as soon as practicable.

Concluding Remarks

We thank you for the opportunity to provide these comments. We would be happy to address any questions you may have and appreciate the time you are taking to consider our points of view. Please feel free to contact us at cac@cfacanada.org on this or any other issue in future.

*(Signed) The Canadian Advocacy Council for
Canadian CFA Institute Societies*

**The Canadian Advocacy Council for
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