



August 12th, 2019

DELIVERED BY EMAIL

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RE: IIROC REQUEST FOR COMMENT on PROPOSED AMENDMENTS to RESPECTING CLIENT IDENTIFIERS FOR REPORTABLE DEBT TRANSACTIONS published on July 11, 2019

Dear Ms. Lam,

National Bank Financial Inc. ("NBF Inc.") and National Bank Independent Network Inc. (NBIN Inc.), a division of NBF Inc., appreciates the opportunity to comment on the following Proposed Amendments. Together we represent the Wealth Management and Financial Markets sectors of NBF Inc., and the 400 independent firms serviced through NBIN. In general, we support IIROC's statutory mandate to provide protection to investors from unfair, improper or fraudulent practices, to foster fair and efficient capital markets and to restore confidence in capital markets. We recognize that the Client Identifier initiative will support this mandate and we trust that our comments will be considered during the comment process and will provide a productive contribution to the outcome of the Proposal.

Implementation Timelines

We respectfully request that the implementation date of Phase 1 be extended to April 27, 2020 to coincide with [Rules Notice 19-0089](#) – Changes to the Implementation Date of Amendments to Transaction Reporting for Debt Securities.

Alternatively, for all Institutional clients that are required to obtain an LEI, we ask that the timeframe correspond with the Phase 3 implementation date of April 19, 2021 outlined for listed securities transactions.



As noted in our comment letter submitted for the initial proposal, we will have challenges in meeting the timelines due to two important aspects: Client Outreach and Technical Build.

Client Outreach

Within MTRS, the LEI is already an optional field but in many cases, we will need to obtain a valid LEI. Through the initial implementation of MTRS, some LEIs were provided by IIROC but these are no longer valid. Obtaining LEIs from all eligible clients, will require time and resources in order to effectively communicate and educate them in the requirements for obtaining an LEI. Subsequently, these clients will also need time to obtain the LEIs and provide them back to NBF.

Technical Build

Technical builds are still required to connect multiple-facing systems between our clients, their end clients, our internal systems, the marketplaces and downstream to IIROC. It is also critical to ensure that robust Cybersecurity protocols are in place. We feel that it will be a challenge to ensure all aspects are implemented in a timely manner and without any adverse impact on our clients.

Conclusion

We would like to continue to work with IIROC to find a feasible, yet prudent phased-in approach to implementing a regime of client identifiers. We look forward to hearing from IIROC alongside further clarification and amendments to this Proposal after careful review of the public commentary forthwith.

A handwritten signature in black ink, appearing to read 'Patrick McEntyre', written over a horizontal line.

Patrick McEntyre
Managing Director
National Bank Financial

A handwritten signature in blue ink, appearing to read 'Mike L. Tocheri', written over a horizontal line.

Mike L. Tocheri
Senior Vice-President
National Bank Independent Network