

**INVESTMENT INDUSTRY REGULATORY ORGANIZATION OF CANADA**  
**AMENDMENTS TO TRADE-CONFIRMATION SUPPRESSION REQUIREMENTS**  
**SUMMARY OF COMMENTS RECEIVED AND IIROC RESPONSE**

**Summary of comments received**

One commenter was fully supportive of the Amendments.

The other commenter was supportive of the Amendments to make the trade-confirmation suppression requirements more practical and less stringent and in particular, the removal of the “minimum three consecutive compliant quarters” criterion. In addition, this commenter suggested an alternative to the proposed reduction of the minimum quarterly compliant trade percentage threshold to 85% for matched trades. The commenter suggested that a criterion based on the quarterly statistics for delivery against payment (**DAP**)/receipt against payment (**RAP**) trades submitted to the Canadian Depository for Securities (**CDS**), would be a more useful method of determining who qualifies for trade-confirmation suppression (the **Proposed Alternative**).

**IIROC response**

We thank both commenters for their comments.

The Proposed Alternative is outside the scope of the Amendments, whose purpose is to tweak the trade-confirmation suppression criteria and continue to rely on trades matched compliance rates.

The Proposed Alternative would represent a fundamental shift for the investment industry from the use of “trades matched compliance rates” to “trades entered compliance rates” as a regulatory tool to minimize settlement risk. Consequently, such a fundamental shift would require us to conduct significantly more analysis in order to assess the potential impacts that such a change could have on trade matching and settlement rates, especially when the industry has now moved to a shorter settlement cycle.

We may consider, as a future initiative, the Proposed Alternative but at this time we believe it is beyond the scope of the Amendments.