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**Delivered by Email**

British Columbia Securities Commission  
Alberta Securities Commission  
Saskatchewan Financial Services Commission  
Manitoba Securities Commission  
Ontario Securities Commission  
Autorité des marchés financiers  
Financial and Consumer Services Commission of New Brunswick  
Superintendent of Securities, Department of Justice and Public Safety, Prince Edward Island  
Nova Scotia Securities Commission  
Superintendent of Securities, Newfoundland and Labrador  
Registrar of Securities, Northwest Territories  
Registrar of Securities, Yukon Territory  
Superintendent of Securities, Nunavut

Me Anne-Marie Beaudoin  
Corporate Secretary  
Autorité des marchés financiers  
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The Secretary  
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[comments@osc.gov.on.ca](mailto:comments@osc.gov.on.ca)

**Re: Proposed National Instrument 13-103 [System Replacement Rule] and Proposed Repeal and Replacement of Multilateral Instrument 13-102 System Fees for SEDAR and NRD**

Dear Sirs and Madames:

CI Investments Inc. (“**CI**”) appreciates the opportunity to comment on proposed National Instrument 13-102 and Related Amendments [Systems Replacement Rule] (the “**Systems Rule**”) and Proposed Repeal and Replacement of Multilateral Instrument 13-102 Systems Fees for SEDAR and NRD (the “**Systems Fees**”), both of which were published on May 2, 2019.

CI is one of Canada’s largest independent investment fund managers and is registered as an Investment Fund Manager, Exempt Market Dealer, Portfolio Manager and a Commodity Pool Trader, with assets under management of \$130 billion as of June 30, 2019. CI is a wholly owned subsidiary of CI Financial Corp. (“**CIX**”), a diversified wealth management company whose principal business is the management, marketing, distribution and administration of mutual funds, segregated funds, exchange-traded funds, structured products and other fee-earning investment products for Canadian investors. CIX also has asset management business operations in Australia and New Zealand through its subsidiary, GSFM Pty Ltd. In addition to asset management, CIX carries on an asset administration business through its subsidiaries



Assante Wealth Management (Canada) Ltd. (“**Assante**”) and BBS Securities Inc. (“**BBS**”). As at June 30, 2019, Assante, through its subsidiaries and affiliates, administered approximately \$47 billion in mutual funds, stocks, bonds, GIC’s, and insurance products for its clients.

### **National Renewal System**

CI commends the CSA for undertaking the proposed integrated information and filing system (the “**National Systems Renewal Program**” or “**NSRP**”) as the existing databases and processes are outdated and have exceeded their useful lifespan. We are also very encouraged that the CSA has adopted a harmonized approach to the NSRP as we anticipate that this approach will reduce the regulatory burden for market participants. A secure, web-based application will result in a more efficient exchange of information, thereby increasing productivity for both registrants and regulators. In this regard, we encourage the CSA to establish functionality that provides for the integration of existing processes within the NSRP that allows for the two-way exchange of information.

The creation of a robust and efficient NSRP is in the best interest of regulators and market participants. As such, CI recommends that the CSA establish a working group of industry representatives to define and prioritize the system requirements for the NSRP. This working group would leverage the knowledge and resources that reside within the industry. As an example, the industry representatives could help define the system testing requirements and conduct the initial testing of the NSRP.

Subsection 3(a) to (e) of the Systems Rule indicates that documents required in connection with a hearing, compliance review, proceeding or investigation will never be filed or delivered through the NSRP. CI questions why these documents should not be filed or delivered through the NSRP given the system security presumed to be included in the NSRP. Allowing for the electronic exchange of these types of documents would further eliminate regulatory burden for registrants and provide increase efficiency for regulators.

### **National System Fees**

CI is generally supportive of the CSA’s proposed System Fees for specified filings made by market participants. We agree that the flat fee structure, paid only to the principal regulator, will simplify and improve upon the current fee system.

The CSA’s impact analysis of the proposed System Fees indicates that, overall, there will be a 7% reduction in systems fees paid, with approximately 45% of market participants having a reduction or no change in system fees paid. However, we are concerned that investment fund managers can expect their system fees to increase by 8% as many investment fund managers may need to pass these increased costs onto investors. Increased costs resulting from the growing regulatory burden is contrary to the objectives of most fund companies as they negatively affect investors’ ability to achieve their savings objectives.

CI appreciates the opportunity to provide our input to this important initiative, and as always, we are available to discuss these comments if there are questions.

Yours truly,

Tim Currie  
Vice President, Regulatory Affairs  
CI Investments Inc.