

October 23, 2020

SUBMITTED VIA EMAIL

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

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.gc.ca

To Whom it May Concern:

Re: CSA Consultation Paper 25-402 Consultation on the Self-Regulatory Organization Framework (the "Consultation Paper")

Aviso Wealth Inc. ("Aviso Wealth") appreciates the opportunity to provide comments with respect to the Canadian Securities Administrators' (the "CSA") Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework*.

Aviso Wealth is an integrated wealth management company which includes an IIROC dealer, Credential Qtrade Securities (CQSI); two MFDA dealers, Credential Asset Management and Qtrade Asset Management; an Investment Fund Manager, NEI Investments; and an insurance agency. Aviso Wealth is owned 50% by Desjardins and 50% by the Provincial Credit Union Centrals and The CUMIS Group Limited (Co-operators Life Insurance Company).

Aviso Wealth occupies a unique place in the wealth management landscape. We partner with the majority of credit unions across Canada to provide wealth management services to their members. At present, this network comprises over 1,700 active branch locations in all urban centres and many rural locations, with CQSI having approximately 500 IIROC registered representatives ("Registered Representatives") and our MFDA dealers having approximately 2,400 mutual fund representatives ("MF Representatives"). We



partner with credit unions because they do not wish to operate their own dealer, and do not have the scale required to do so. An integrated wealth management platform supports our credit union partners' wealth initiatives by providing the tools, training and products required to enhance and differentiate their members' wealth management experience. A consolidated SRO will further allow for integration of wealth management for our credit union partners and our shared clients.

Of the 1,782 active coast-to-coast branch locations across our credit union network, 81% reside *outside* the large urban centres (Toronto, Montreal, Ottawa, Vancouver, Calgary, Edmonton, and Winnipeg). Through their partnership with Aviso Wealth as their dealer, credit unions serve many smaller and rural communities across Canada that otherwise may have limited local access to investment advice. Credit unions serve all members in their communities, regardless of wealth level, thereby helping bridge the advice gap by ensuring more Canadians have access to advice.

The representatives and, in turn, clients of these credit union branches would benefit greatly from the clarity, simplicity and efficiencies gained through a single SRO. A consolidated SRO would also provide material benefits to Aviso Wealth that would accrue to our entire credit union network. It would allow us to consolidate all our representatives under one dealer and provide a streamlined client service experience while maintaining an uncompromising level of investor protection. These benefits are outlined in more detail below.

General

We support the review of the current regulatory framework which includes the Investment Industry Regulatory Organization of Canada ("IIROC") and the Mutual Fund Dealers Association of Canada ("MFDA"): collectively, the self-regulatory organizations ("SROs"). The current SRO regulatory framework in Canada requires investment dealers to be members of IIROC and mutual fund dealers to be members of the MFDA, except in Québec where mutual fund dealers are directly regulated by the Autorité des marchés financiers ("AMF"). The current regulatory framework with both the MFDA and IIROC has been in place for over twenty years and, in that time, the delivery of financial services and products has continued to evolve.

Much has been written about the effectiveness of regulation in Canada and the fractured nature of regulation due to responsibility residing at the provincial and territorial levels. Each of the provincial and territorial regulatory authorities has its own priorities and programs, which has caused concern over the nature and effectiveness of Canada's financial industry. Having two major SROs, which substantially conduct the same activities, significantly reduces the effectiveness of financial services regulation in Canada.

The Consultation Paper poses the question of whether a merged SRO should govern all retail-facing products and services such as portfolio managers, exempt market dealers ("EMDs"), and scholarship plan dealers ("SPDs").

IIROC and the MFDA both have published their recommended ideal structure for what a new Canadian SRO should look like. The IIROC proposal is a straight merger of IIROC and the MFDA. The MFDA proposal is more complicated and includes: an IIROC and MFDA merger; all currently CSA-regulated retail-facing entities (portfolio managers, EMDs, SPDs, etc.); and the transfer of the IIROC surveillance group to the CSA.

Regarding the MFDA's recommendation that all retail-facing activities should fall under a new SRO, Aviso Wealth's view is that this may be a reasonable framework, but requires a deeper analysis to understand its impacts. Our view is that this would be much more complex to implement than a strict IIROC/MFDA merger and would require a longer time frame to be successfully launched. We therefore do not support this model; however, we would take the approach that it could be implemented as a second phase.



Aviso Wealth's position

Aviso supports a single SRO that regulates retail-facing securities dealers and mutual fund dealers. We support a model that is simple, continues to protect investors, and can be implemented in the near term. In the event that the CSA develops an entirely new SRO structure without leveraging existing frameworks, there could be years of debate before any tangible action is taken, and this would be to the detriment of both the financial industry and investors.

A single SRO has many potential benefits for clients and advisors, for Aviso Wealth and its credit union partners, and for the industry.

Client benefits

Clients would be served more efficiently and effectively. In the case of a client who has invested in mutual funds and proposes to invest in individual securities, they would no longer be required to switch dealers in order to be serviced by a different representative with increased proficiency, or to stay with their representative who increases their proficiency. For example, a client could switch between a MF Representative and a Registered Representative without having to fully repaper the account, receive a new account number, familiarize themselves with new policies applicable to their account, become used to different account statements, agree to new account terms, etc. The administrative complexity, time and cost of closing accounts, transferring assets and opening new accounts is burdensome for both clients and dealers.

Clients will continue to be well protected by a consolidated SRO. Clients' understanding of the regulatory system in Canada will be enhanced through a single, simplified complaint resolution and investor protection process. We believe there will be far less investor confusion because the process, systems, and paperwork will be the same. We believe that the simpler it is for the investor, the more it will support financial literacy and public confidence in the system in Canada.

In our evaluation, there will be no investor protection issues if a single SRO is approved by the CSA. Both MF Representatives and Registered Representatives will continue to be proficient and effective in transacting in suitable products and services on behalf of their clients. A single SRO will continue with strong corporate governance, solid oversight programs, and an appropriate rule-making framework.

Advisor benefits

A single SRO benefits Advisors because it will give them the opportunity to transition more seamlessly from being a MF Representative to a Registered Representative who may offer more complex products and services. This provides Advisors with area simpler career path and does not cause them to leave their firm, and possibly their clients, when changing registration categories.

Industry benefits

We understand that a merged SRO will sustain the regulations and operating processes that exist today. However, we vigorously support the idea that a new SRO is an opportunity to embrace fresh thinking to enhance and optimize the regulatory approach. The industry requires a nimbler, future-looking, and supportive regulatory framework to meet the needs of the investing public. The new SRO is not about maintaining legacy ways but about meeting the ever-changing needs of the Canadian investor.

The current SRO regulatory framework does not reflect the recent transformations in the capital markets driven by technological innovation and client preferences. It has been clear for some time that there is a pressing need to align the evolving integration of financial advice and products with an integrated regulatory structure. Regulation should reflect clients' needs and their desire for "one-stop access" to financial services, and should not be based on transactions or products.



A new SRO is an opportunity for the industry and the public to have a consistent approach in regulating certain matters and to be forward-thinking when looking at the evolution of advice in Canada.

Dealer benefits

One SRO would result in cost savings for our credit union partners and for Aviso Wealth. Instead of operating their wealth business activities under two regulatory entities, credit unions can operate with one set of administrative processes, under just one regulatory entity. The cost of running two platforms is substantial and unnecessarily burdensome.

Expected cost savings for credit unions and for Aviso Wealth relate to elimination of duplicative costs in legal, regulatory, tax, operations, compliance, and technology matters. The cost savings, which will increase over time, will allow us and our partners to invest further in our business, improving the client experience as we do. Further, we would be able to improve client access to the right representative and service offering at each point in their investing lifecycle within a model that is highly risk controlled for the client and the firm.

Aviso Wealth would have a greater ability to keep up with the accelerating pace of change in technology advancements, as well as operational and compliance demands. These changes require significant investments of time and capital, and the pace of change will only increase. In our view, making these investments across multiple dealers is unnecessarily duplicative and economically untenable. Running separate dealers imposes a burden on Aviso Wealth, our credit union partners and our clients.

A single SRO would allow us to operate one dealer platform and focus our efforts and improvements and future growth plans. We expect that these efficiencies and savings would allow Aviso Wealth to ensure that our resources are dedicated to areas such as client support and product and system innovation.

Conclusion

The current SRO framework requires immediate action be taken. Aviso Wealth supports the CSA's consideration of this issue. We would be pleased to respond to any questions that you may have in respect of our comments. We also have asked and obtained support from our credit union partners in connection to our comment letter. We have attached their signed support to this letter.

Thank you for considering our submission.

Yours truly,

William (Bill) Packham President & CEO

Alexandra Williams Senior Vice President, Head of Service, Operations and Compliance

Wanda Frisk Senior Vice President, Head of Credit Union Wealth Management

affinitycu.ca 1.866.863.6237



October 15, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

To Whom it May Concern:

Re: Aviso Wealth comment letter in response to CSA Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework*

Our credit union executive leadership team has reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

Along with Aviso Wealth, we support the review of the current regulatory framework. We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

Mark Lane, CEO Affinity Credit Union



October 15, 2020

Attention:

The Secretary **Ontario Securities Commission** 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8

M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

B3Fr

Robert Paterson President & CEO









Head Office 1250 Lonsdale Avenue North Vancouver, BC | V7M 2H6 T 604.982.8000 1.888.713.6728 F 604.985.6810 blueshorefinancial.com

October 16, 2020

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8

Me Philippe Lebel Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1

consultation-encours@lautorite.qc.ca

Submitted electronically

To whom it may concern,

The purpose of this letter is to provide support of Aviso Wealth's comment letter in response to CSA Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework.*

Founded in 1941, BlueShore Financial currently has nearly \$7 billion in assets under administration with approximately 40,000 members. BlueShore's award winning Financial Spas® are designed to provide a high-quality experience to our members in 12 locations, and financial planning services are a key component of our business model.

As Chief Executive Officer, and SVP, Retail & Business Banking, we have reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

Along with Aviso Wealth, we support the review of the current regulatory framework. We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

ChrisCutiff

Chris Catliff President & CEO

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Reg Marrinier SVP, Retail & Business Banking



October 16, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

To Whom it May Concern:

Re: Aviso Wealth comment letter in response to CSA Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework*

Our credit union executive leadership team has reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

Along with Aviso Wealth, we support the review of the current regulatory framework.

We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Cambrian Credit Union Limited

David Mortimer

President & Chief Executive Officer



TOGETHER, LET'S DO GREAT THINGS

October 21, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

To Whom it May Concern:

Re: Aviso Wealth comment letter in response to CSA Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework*

Our credit union executive leadership team has reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

Along with Aviso Wealth, we support the review of the current regulatory framework.

COASTAL COMMUNITY CREDIT UNION

We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Adrian Legin President and CEO, Coastal Community Credit Union

cccu.ca t 1.888.741.1010 F 250.741.3223





October 23, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

To Whom it May Concern:

Re: Aviso Wealth comment letter in response to CSA Consultation Paper 25-402 Consultation on the Self-Regulatory Organization Framework

On behalf of Thrive Wealth Management, a financial planning company owned by Conexus Credit Union, a review of Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper has been completed.

Along with Aviso Wealth, we support the review of the current regulatory framework.

We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit unions, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Jill Huls, MBA, CFP Chief Executive Officer

Thrive Wealth Management A CREDIT UNION COMPANY 703 Circle Drive East Saskatoon, SK S7K 0V1



DIVISIONS

Mountain View Financial First Calgary Financial Chinook Financial Legacy Financial

October 21, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

To Whom it May Concern:

Re: Aviso Wealth comment letter in response to CSA Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework*

Our credit union executive leadership team has reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

Along with Aviso Wealth, we support the review of the current regulatory framework.

We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our formal signed support of Aviso Wealth's comment letter and are hopeful for a future where Canada's investment regulatory framework can consolidate to provide the strength, simplicity and clarity required for an elevated investor experience.

P. T. My

Paul Kelly CEO Connect First Credit Union Ltd

Wellington Holbrook Chief Operating Officer Connect First Credit Union Ltd



October 14, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

To Whom it May Concern:

Re: Aviso Wealth comment letter in response to CSA Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework*

Our credit union executive leadership team has reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

Along with Aviso Wealth, we support the review of the current regulatory framework.

We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

Jay Corrado ____ CEO CUSO Wealth Strategies Inc.



October 20, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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Along with Aviso Wealth, we support the review of the current regulatory framework.

We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Launi Skinner CEO, First West Credit Union

6470 – 201 Street | Langley, BC | V2Y 2X4 | t: 604-539-7300 firstwestcu.ca





October 16, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Daniel Johnson, B.Comm, C.Dir | Chief Executive Officer

Innovation Credit Union

306.741.0708



Corporate Office

#300-678 Bernard Avenue Kelowna, BC V1Y 6P3 Tel: 250.869.8200 Fax: 250.762.9581

October 22, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Kathy Conway, FCPA, FCA President and CEO Interior Savings Credit Union



libro.ca 4th Floor 217 York Street London ON N6A 5P9

T 519-672-0130 F 519-672-7831 1-800-361-8222

October 15, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Stephen Bolton President & CEO

Toronto Corporate Office 3280 Bloor Street West Centre Tower, 7th Floor Toronto, ON M8X 2X3 (416) 597-4400 meridiancu.ca



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The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Bin Mai

Bill Maurin President & CEO

Meridian Credit Union Limited

Corporate Office #1900- 13450 102 Avenue Surrey, BC V3T 5Y1

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October 15, 2020

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The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Gavin Toy President & Chief Executive Officer

GT/



Robert Moreau Chief Executive Officer

October 22, 2020

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8

M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Chief Executive Officer

Robert Moreon

Robert Moreau



Vancity Centre 183 Terminal Avenue Vancouver BC V6A 4G2 T 604.877.7000 vancity.com

October 15, 2020

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The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

VANCOUVER CITY SAVINGS CREDIT UNION

hesti

Christine Bergeron Interim President and Chief Executive Officer

Vancouver City Savings Credit Union



October 22, 2020

Access Credit Union Unit #2, 23111, PTH #14 Winkler, MB R6W 4B4

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

To Whom it May Concern:

Re: Aviso Wealth comment letter in response to CSA Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework*

Our credit union executive leadership team has reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

Along with Aviso Wealth, we support the review of the current regulatory framework.

We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Larry Davey, MBA, ICD.D President and CEO Access Credit Union



diamondnorthcu.com

October 22, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Randall Kerluke VP of Retail Services

Helping People and Communities Succeed



5255 Yonge Street, 4th Floor, Toronto, ON M2N 6P4 416-223-8838 | www.duca.com

October 21, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Douglos S. Conicle.

Doug Conick CPA, CA President & CEO DUCA Credit Union Ltd. Chair, DUCA Impact Lab Email: dconick@duca.com Office direct: 416 590 2390



Powell River 4721 Joyce Avenue Powell River, BC V8A 3B5 Tel: 604-485-6206 Fax: 604-485-7112 1-800-393-6733

Texada Island 2021 Legion Road PO Box 268 Van Anda, BC V0N 3K0 Tel: 604-486-7851 Fax: 604-486-7671 1-800-361-9933

Bowen Island 106-996 Dorman Rd PO Box 190 Bowen Island, BC V0N 1G0 Tel: 604-947-2022 Fax: 604-947-2022 1-866-947-2022

Cumberland 2717 Dunsmuir Ave PO Box 138 Cumberland, BC VOR 150 Tel: 250-336-2272 Fax: 250-336-8424

Courtenay

14-1599 Cliffe Ave Courtenay, BC V9N 2K6 Tel: 250-336-0905 Fax: 250-338-2644 1-866-336-0905

Administration 4448A Marine Avenue Powell River, BC V8A 2K2 Tel: 604-485-0978 Fax: 604-485-1231 1-866-585-0978

www.firstcu.ca

October 21, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 Me Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Linda Bowyer President & CEO First Credit Union



October 23, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

mt

Lloyd Smith, CEO FirstOntario Credit Union Limited



October 16, 2020

The Secretary	M ^e Philippe Lebel, Corporate Sec.
Ontario Securities Commission	and Executive Director, Legal Affairs
20 Queen Street West, 22nd Floor	Autorité des marchés financiers
Toronto, Ontario M5H 3S8	Place de la Cité, tour Cominar
	2640, boulevard Laurier, bureau 400
	Québec G1V 5C1

To Whom it May Concern,

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Our credit union Executive Management team has reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Jeff Shewfelt Co-CEO

Bill Kiss Co-CEO

/lb



CORPORATE 7375 Kingsway Burnaby BC V3N 3B5 604-419-8888



October 16, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

To Whom it May Concern:

Re: Aviso Wealth comment letter in response to CSA Consultation Paper 25-402 *Consultation on the Self-Regulatory Organization Framework*

Kawartha Credit Union is one of the larger credit unions in Ontario. We currently have 14 mutual fund representatives dealing with Credential Asset Management and 2 IIROC registered representatives dealing with Credential Qtrade Securities. Our credit union executive leadership team has reviewed Aviso Wealth's comments in response to the Canadian Securities Administrators' Consultation Paper.

Along with Aviso Wealth, we support the review of the current regulatory framework.

We strongly endorse the position expressed by Aviso Wealth with respect to the preference for a simpler regulatory model that continues to protect investors, and that can be implemented in the near term. We agree with the rationale that a single self-regulatory organization is likely to deliver tangible benefits to our members, our advisors, our credit union, and to all industry participants.

We are pleased to provide our signed support of Aviso Wealth's comment letter.

Robert Wellstood Chief Executive Officer

mainstreet

October 19, 2020

Attention:

The Secretary **Ontario Securities Commission** 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8

Me Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.gc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Ianet Grantham President and Chief Executive Officer

Mainstreet Head Office T. 519.542.0483
 1295 London Road
 F. 519.542.3778

 Sarnia, ON N7S 1P6
 TF. 866.380.8008

www.mainstreetcu.ca

Invested in you.



October 20, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely, NORTHERN SAVINGS CREDIT UNION

Robert Marshall

R.D.(Bob) Marshall President & Chief Executive Officer

/rdm

Corporate Office

 138 Third Avenue West

 Prince Rupert, BC V8J 1K8

 tel
 250.627.3600

 fax
 250.627.3602

Masset 1663 Main Street, PO Box 94 Masset, BC VOT 1MO tel 250.626.5231 fax 250.626.5498

Prince Rupert

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 Prince Rupert, BC
 V8J 1K8

 tel
 250.627.7571

 fax
 250.624.8297

Queen Charlotte

 110 Causeway Street, PO Box 38

 Queen Charlotte, BC
 VOT ISO

 tel
 250.559.4407

 fax
 250.559.4729

Terrace

4660 Lazelle Avenue Terrace, BC V8G 1S6 tel 250.638.7822 fax 250.638.7842



Noventis Credit Union Box 1139 Gimli, Manitoba RoC 1Bo

T 204 642 6450 F 204 642 6474 E info@noventis.ca

October 21st, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Kevin McKnight, CPA, CGA, MBA, CCD Chief Executive Officer





October 23, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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Sincerely,

Jillian Carlson, B.Sc.Ag. PFP,CPCA Vice President Wealth and Insurance Prairie Centre Credit Union PO Box 220 Kyle, SK SOL 1T0 Saskatchewan

Beechy Branch Box 8 SOL 0C0 P: 306-859-2262

Dinsmore Branch Box 130 SOL 0T0 **P:** 306-846-2052

Eatonia Branch Box 399 SOL 0Y0 **P:** 306-967-1212

Elbow Branch Box 100 S0H 1J0 **P:** 306-854-2118

Elrose Branch Box 39 SOL 0Z0 P: 306-378-2535

Eston Branch Box 129 SOL 1A0 **P:** 306-962-3634

Harris Branch Box 40 SOL 1K0 P: 306-656-4466

Herbert Branch Box 328 S0H 2A0 P: 306-784-2588

Kyle Branch Box 220 SOL 1T0 P: 306-375-2213

Loreburn Branch Box 68 S0H 2S0 P: 306-644-2118

Morse Branch Box 269 S0H 3C0 P: 306-629-3388

Outlook Branch Box 339 SOL 2N0 **P:** 306-867-9911

Rosetown Branch Box 940 SOL 2V0 **P:** 306-882-2693

Spiritwood Branch Box 129 S0J 2M0 **P:** 306-883-2250

Administration Office Box 940

Box 940 Rosetown SOL 2V0 **P:** 306-882-4000

Centralized Loan Support Box 339 Outlook SOL 2N0 P: 306-867-9914





October 19, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar, 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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Sincerely,

Glenn Friesen CEO Steinbach Credit Union steinbach, MB R5C 1B1 204.326.3495 204.222.2100

1575 Lagimodiere Blvd Winnipeg, MB R3W 0B9 204.661.1575 Toll-free in North America 1.800.728.6440 scu.mb.ca



October 16, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8 M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.qc.ca

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We are pleased to provide our signed support of Aviso Wealth's comment letter.

Sincerely,

Wie Alang

Glenn Stang, CEO



1.866.825.3301 www.synergycu.ca



PO Box 1117 Stn Main, Weyburn SK S4H 2L3 **T** 800 667 8842 **F** 306 842 4964 info@weyburncu.ca \ weyburncu.ca

Monday, October 19, 2020

Attention:

The Secretary Ontario Securities Commission 20 Queen Street West, 22nd Floor Toronto, Ontario M5H 3S8

M^e Philippe Lebel, Corporate Sec. and Executive Director, Legal Affairs Autorité des marchés financiers Place de la Cité, tour Cominar 2640, boulevard Laurier, bureau 400 Québec (Québec) G1V 5C1 consultation-encours@lautorite.gc.ca

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Don Shumlich Chief Executive Officer

October 23, 2020

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Kerry Hadad Chief Executive Officer Your Neighbourhood Credit Union