

# RAYMOND JAMES®

November 23, 2012

**Via Email: [comments@osc.gov.on.ca](mailto:comments@osc.gov.on.ca)**

Ontario Securities Commission  
20 Queen Street, West  
Suite 800, Box 55  
Toronto, ON M5H 3S8

Dear Sirs/Mesdams:

**Re: Proposed Amendments to OSC Rule 13-502 Fees and Companion Policy**

In response to the request for comments on proposed amendments to OSC Rule 13-502, Raymond James Ltd. (“Raymond James”) is pleased to have the opportunity to comment. Raymond James is a full service investment dealer registered in all the provinces and territories in Canada and is a member of both the Investment Industry Regulatory Organization of Canada (“IIROC”) and the Investment Industry Association of Canada (“IIAC”). As a member of the IIAC, we support the IIAC’s comments on these proposals.

The proposed fee increase raises a number of concerns.

1. Chief among those concerns is that cost increases, from any source, are inflationary and will be absorbed ultimately by our clients. As a full service investment firm, two-thirds of our clients are individual investors.

At Raymond James, 65% of our clients are now over the age of fifty. The majority of these clients are sixty years and older. Clients planning for, or in retirement are savers, which is challenging given low interest rates on their savings accounts and low market returns given the weak global economy.

The biggest risk to these clients is inflation because it erodes spending power and their standard of living.

2. Investment firms and their employees are important contributors to the Canadian economy. Many of these firms are under pressure due to lingering weak economy, to the point that many firms are unprofitable.

A prolonged weak business cycle will force some of these firms out of business.

Your proposed fee increase, on top of the heightened regulatory cost burden is compounding the challenge faced by these firms.

**Raymond James Ltd.**

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*Member of Canadian Investor Protection Fund*

We appreciate the need to continue to work to protect investors and raise confidence in the capital markets, however, rather than incur additional costs we would encourage the OSC to find the funds internally by reviewing existing and planned projects that can be deferred.

To continue with the planned fee increases does not reflect the reality facing individual investors and industry participants.

Respectfully,

Raymond James Ltd.

A handwritten signature in black ink, appearing to read "Paul Allison", is written over a thin horizontal line.

Paul D. Allison  
Chairman & CEO

cc. Mr. Ian Russell, President & Chief Executive Officer,  
Investment Industry Association of Canada  
Ms. Deborah Wise, Assistant Director,  
Investment Industry Association of Canada