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September 15th, 2000

British Columbia Securities Commission
Alberta Securities Commission
Saskatchewan Securities Commission
The Manitoba Securities Commission
Ontario Securities Commission
Office of the Administrator, New Brunswick
Registrar of Securities, Prince Edward Island
Nova Scotia Securities Commission
Securities Commission of Newfoundland
Registrar of Securities, Northwest Territories
Registrar of Securities, Nunavut
Registrar of Securities, Yukon Territory

c/o John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
Suite 800, Box 55
Toronto, Ontario
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jstevenson@osc.gov.on.ca

RE: Canadian Securities Administrators Staff Notice 31-401
Registration Forms Relating to the National Registration Database

Thank you for the opportunity to provide comments on the Canadian Securities Administrators (“CSA”) Staff Notice 31-401 (“the Notice”). We are very supportive of the CSA’s initiative to provide web-based registration forms and filing facilities. We are pleased to offer the following comments on the Notice for your consideration.

- 1) Our firms, along with many others, have numerous applicants who are required to be registered in all jurisdictions across Canada. Those applying for registration in multiple jurisdictions must currently file separate applications in each jurisdiction. We recommend that one application be filed via the web-enabled process with the jurisdictions identified in which the applicant seeks registration. In accordance with this filing, we would further recommend that approval from the “home” jurisdiction be sufficient to permit the registrant to commence activities in all jurisdictions in which he/she has sought registration and to which fees are submitted.
- 2) In conjunction with 1) above, a number of additional forms, although not prescribed forms, are required in many jurisdictions for new registrations of individuals, amendments to registration and termination of registration, including the following:
 - Securities Fraud Information Centre – Records Request and Reply (or equivalent);
 - Notification and Consent re: Collection of Personal Information Under the Freedom of Information and Protection of Privacy Act (Ontario only);
 - Acknowledgement and Agreement of Review of Registration for Investment Dealers Association Applicants (Ontario only);
 - Acknowledgement of Conditional Registration, subject to criminal record check, for Investment Dealers Association of Canada Applicants (Alberta only);
 - Submission to Jurisdiction and Appointment of Agent for Service documentation (Saskatchewan and Ontario);
 - Application for Amendment of Registration or Transfer of Registration;
 - Uniform Termination Notice.

We would ask you to consider inclusion of these additional forms in the web-enabled forms currently under development. Notwithstanding the fact that these are not prescribed forms, their inclusion in this project would provide material impetus to the development of a truly national registration database and process.

- 3) Several jurisdictions (Nova Scotia, Alberta, British Columbia and Saskatchewan) currently require applicants to supply personal and/or financial institution references. We recommend that this requirement be eliminated, in favour of the sponsoring firm’s support of the application. Adoption of this would also contribute to advancement of a standardized registration process and enhance the uniformity engendered by this project.
- 4) Material changes to information provided in individual registrants’ applications for registration are currently reported through correspondence addressed to the regulatory bodies. We recommend that consideration be given to reporting material changes through completion and filing of web-enabled amended applications.

- 5) We recommend that Present Position in Firm be amended by adding “subject to regulatory approval” for new applicants.
- 6) We recommend that the following courses of study be added to the list of proficiency requirements:
 - Branch Compliance Officer Course (Institute of Canadian Bankers);
 - CDNX Traders Examination;
 - 90 Day Training Program (Investment Dealers Association, also proposed for the Mutual Funds Dealers Association);
 - Continuing Education (Investment Dealers Association, also proposed for the Mutual Funds Dealers Association);Please note that the draft application asks for the applicant’s student number, which may not be readily available. We recommend that the application be amended to provide “if available”, if there is any likelihood that inavailability of this information would delay review or approval of an application.
- 7) We recommend that The Winnipeg Stock Exchange be included in the list of Self-Regulatory Organizations.
- 8) We recommend the following additions and deletions to the list of registrant categories:
 - Director (add Industry/Non-Industry);
 - Delete ACE Trader, ACE Trader/RR, Assistant ACE Trader, VCT Trader.
- 9) We recommend that the Schedule “B” Reporting of Prior Registration or Licensing include the Alberta Stock Exchange (ASE), the Vancouver Stock Exchange (VSE) and the Winnipeg Stock Exchange (WSE).

Thank you for giving us the opportunity to provide input on this subject.

Yours truly,

Douglas B. Carnall
Senior Manager, Registration Services
Officer: TD Asset Management Inc., TD Securities Inc.,
TD Waterhouse Investor Services (Canada) Inc.,
CT Investment Management Group Inc.