



May 2, 2006

Via Electronic Mail to jstevenson@osc.gpv.on.ca

British Columbia Securities Commission
c/o John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
Suite 1903, Box55
Toronto, Ontario
M5H3S8

Re: Proposed National Instrument 24-101

Dear Mr. Stevenson:

ISITC North America¹ ("ISITC") respectfully submits this letter in response to the Canadian Securities Administrator's ("CSA") request for comments on its proposed revised rules and policies release entitled "National Instrument 24-101 – Institutional Trade Matching" for the comment period ending May 2, 2006. ISITC is supportive of the CSA's efforts to provide a legislative frame work to foster timely processing and settlement of institutional trades. We view these revised rule changes as an appropriate solution towards creating a more efficient market place within Canada.

While your request for comments noted eight (8) separate questions, ISITC would like to respond specifically to questions 3 and 8:

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Question 8: "Are the transitional percentages outlined in Part 10 of the Instrument practical? "

- We anticipate the implementation schedule could create challenges for some market participants involved. In particular the performance targets to avoid exception reporting may prove to be burdensome for smaller to mid-sized participants and the cross border settlement process.

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In conclusion, ISTIC is pleased to provide our response to this critical initiative within Canadian securities industry. We look forward to continuing to work with the CSA and provincial regulators on any future efforts that warrant our inclusion.

Sincerely,

ISITC (North America)
Steve Goswell, Chair
Genevy Dimitrion, Vice Chair
Gary Probert, Vice Chair
Tom Murphy, Executive Committee

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Via Electronic Mail to jstevenson@osc.gpv.on.ca

Alberta Securities Commission
c/o John Stevenson, Secretary
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Toronto, Ontario
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Re: Proposed National Instrument 24-101

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Via Electronic Mail to jstevenson@osc.gpv.on.ca

Saskatchewan Financial Services Commission
c/o John Stevenson, Secretary
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Manitoba Securities Commission
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Via Electronic Mail to jstevenson@osc.gpv.on.ca

New Brunswick Securities Commission
c/o John Stevenson, Secretary
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Via Electronic Mail to jstevenson@osc.gpv.on.ca

Office of the Attorney General, Prince Edward Island
c/o John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
Suite 1903, Box55
Toronto, Ontario
M5H3S8

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Nova Scotia Securities Commission
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Via Electronic Mail to jstevenson@osc.gpv.on.ca

Securities Commission of Newfoundland & Labrador
c/o John Stevenson, Secretary
Ontario Securities Commission
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- We suggest changes in the 2nd tier transition date by increasing the matching deadline to noon on T+1 with a higher percentage trigger before January 1, 2008. This would provide Firms with additional time to assess the impact of the Trade Date deadline and obtain market solutions.
- Secondly, we feel that more information would be needed in the form of a gap analysis on the cost impact to industry participants.

In conclusion, ISITC is pleased to provide our response to this critical initiative within Canadian securities industry. We look forward to continuing to work with the CSA and provincial regulators on any future efforts that warrant our inclusion.

Sincerely,

ISITC (North America)
Steve Goswell, Chair
Genevy Dimitrion, Vice Chair
Gary Probert, Vice Chair
Tom Murphy, Executive Committee

Disclaimer:

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May 2, 2006

Via Electronic Mail to jstevenson@osc.gpv.on.ca

Legal Registries Division, Nunavut
c/o John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
Suite 1903, Box55
Toronto, Ontario
M5H3S8

Re: Proposed National Instrument 24-101

Dear Mr. Stevenson:

ISITC North America¹ ("ISITC") respectfully submits this letter in response to the Canadian Securities Administrator's ("CSA") request for comments on its proposed revised rules and policies release entitled "National Instrument 24-101 – Institutional Trade Matching" for the comment period ending May 2, 2006. ISITC is supportive of the CSA's efforts to provide a legislative frame work to foster timely processing and settlement of institutional trades. We view these revised rule changes as an appropriate solution towards creating a more efficient market place within Canada.

While your request for comments noted eight (8) separate questions, ISITC would like to respond specifically to questions 3 and 8:

Question 3: "The scope of the matching requirements of the Instrument is limited to DAP or RAP trades. Should the requirements be expanded to include other trades executed on behalf of an institutional investor? "

- It is our view that trade matching for securities settling on a deliver against payment and receive against payment basis should be extended to include all trades executed on behalf of an institutional investor's account, as segregating just by trade type could prove to be more difficult to administer. This would capture all account types including Prime Brokerage accounts.

Question 8: "Are the transitional percentages outlined in Part 10 of the Instrument practical? "

- We anticipate the implementation schedule could create challenges for some market participants involved. In particular the performance targets to avoid exception reporting may prove to be burdensome for smaller to mid-sized participants and the cross border settlement process.

¹ ISITC is a globally focused, organization whose membership consists of securities operations professionals representing custodian banks, investment managers, brokers, vendors and utilities. The group's mission is to foster alliances and advocate standards promoting the Straight-Through-Processing (STP) of securities transactions.

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c/o John Stevenson, Secretary
Ontario Securities Commission
20 Queen Street West
Suite 1903, Box55
Toronto, Ontario
M5H3S8

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