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Ontario Securities Commission
SECRETARY'S OFFICE

Mr. John Stevenson
Ontario Securities Commission
20 Queen St West
19th Floor, Box55
Toronto Ont. M5H 3S8

Dear Mr. Stevenson,

re Proposed Amendment to OSC Rule 31-502

We are pleased to provide our comments to the Ontario Securities Commission on the proposed amendment to OSC Rule 31-502, published February 24, 2006.

Raymond James Ltd. is a member of the IDA and provides a full range of services to clients, including mutual fund investments.

We applaud the Commission for taking the initiative to eliminate the requirement that the number of registrants with a restricted registration be limited. We strongly urge the Commission to also repeal the requirement in subsection 2.1(6) where a restricted registrant is required to get a full license within 270 days of joining an IDA member. Our rationale is as follows:

- There are many professionals who deal with the public in mutual funds and hold restricted registrations. This is not a reflection on their professionalism but rather a choice to restrict their investment advice to mutual funds.
- IDA Member firms currently deal in mutual funds through fully licensed registrants and have all the necessary controls and procedures in place to supervise this business activity.
- IDA member firms are used to dealing with registrants with different licensing entitlements such as options and commodity registrants and are quite capable of supervising restrictions on registrants.
- These requirements restrain employment opportunities for mutual fund professionals seeking a career with an IDA member firm, unless he/she is willing to increase their registration capabilities.
- Finally, there is the question of costs. To require IDA member firms to create MFDA members in order to attract mutual fund professionals on the same basis they enjoy with a MFDA member, creates significant additional costs that are ultimately passed on to the investing public.

It is our view that the investing public is well served by professionals holding restricted licenses. We believe that mutual fund registrants should have the same employment opportunities as any others in the financial community.

Thank you for giving us this opportunity to provide comment on the proposed amendments to this Rule. We would be pleased to answer any questions on our submission.

Sincerely,



Peter A. Bailey
President & CEO

Raymond James Ltd.

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