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November 3, 2008

Corporate Secretary
Mutual Fund Dealers Association of Canada
121 King Street West, Suite 1000
Toronto ON M5H 3T9

Sarah Corrigall-Brown
Senior Legal Counsel
British Columbia Securities Commission
701 West Georgia Street, P.O. Box 10142
Pacific Centre
Vancouver B.C. V7Y 1L2

Sent by Email: scorrigall-brown@bcsc.ca; gljubic@mfda.ca

Dear Sir and Madam:

Subject: Proposed Amendments to MFDA Rule 2.6 (Borrowing for Securities Purchases)

Independent Financial Brokers of Canada (IFB) is pleased to provide comments on the above-noted Rule amendment.

IFB is a professional association comprised of approximately 4,000 licensed financial advisors. Our members are self-employed, small business men and women who are located in communities across Canada. IFB supports its members by providing compliance tools and advice, a comprehensive errors and omissions insurance program, sponsoring continuing education events and advocacy with government and industry stakeholders. IFB members must subscribe to the Association's Code of Conduct.

Many of our members are Approved Persons under MFDA rules. Therefore, changes to regulations that may affect how they conduct business in the marketplace are of significant interest to us.

Generally, our members support the proposed change which would require that a risk disclosure document be provided to clients at the time a recommendation is made to purchase securities by borrowing. The current Rule requires that this disclosure statement be provided both at account opening and at the time the recommendation is made. We agree that eliminating the requirement to provide the disclosure statement at account opening will reduce confusion for clients, especially if they are not considering a leverage strategy. More timely disclosure provided at the time of the recommendation highlights the risks for clients and increases its relevancy.

The MFDA is further considering whether to exempt Registered Retirement Savings Plans (RRSP) loans from the disclosure requirements because of their lower risk, the presence of contribution limits and the availability of a tax refund that can be applied to the loan payment. IFB supports this change.

IFB appreciates the opportunity to provide these comments. Should you have any questions please contact the undersigned.

Yours truly,

A handwritten signature in black ink, appearing to read 'John Whaley', written over a horizontal line.

John Whaley
Executive Director
Email: jaw@ifbc.ca