



INVESTMENT INDUSTRY ASSOCIATION OF CANADA
ASSOCIATION CANADIENNE DU COMMERCE DES VALEURS MOBILIÈRES

www.iiac.ca

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Delivered Via Email: legal@tmx.com; consultation-en-cours@lautorite.gc.ca

M^e Alexandre Normandeau
Legal Counsel
Bourse de Montréal Inc.
1800-1190 av des Canadiens-de-Montréal
P.O. Box 37
Montréal, Québec H3B 0G7

M^e Anne-Marie Beaudoin
Corporate Secretary
Autorité des marchés financiers
Tour de la Bourse, P.O. Box 246
800 Victoria Square, 22nd floor
Montréal, Québec H4Z 1G3

Dear M^e Normandeau and M^e Beaudoin,

Re: Bourse de Montréal Inc. – Request for Comments: Amendments to the rules of Bourse de Montréal Inc. to introduce Top-of-the-Book Price Limits to existing price limits.

The Investment Industry Association of Canada (the "IIAC") and its members would like to take this opportunity to express their views on the proposed amendments to the Rules of Bourse de Montréal Inc. regarding the introduction of Top-of-the-Book Price Limits to existing price limits as per Circular 097-19 published on July 8, 2019.

The IIAC is the national association representing the position of 119 IIROC-regulated dealer member firms on securities regulation, public policy and industry issues. We work to foster a vibrant, prosperous investment industry driven by strong and efficient capital markets.

We remind Bourse de Montréal that this comment letter, in its entirety, can be published on the Bourse's website.

Protecting market integrity – Introduction within the existing suite of controls

The IIAC and its members generally agree with the proposal. We believe that the Top-of-the-Book Price Limits could be used to protect market integrity during the early trading session.

We also believe that, as mentioned in the circular, the new dynamic control must be introduced "within the existing suite" of controls. In particular, it is necessary that absolute static limits relative to the prior day are maintained in order to protect market integrity.

Industry members have identified a potential issue with the Top-of-the-book Price Limits if no static limits remain. If there are no orders in the Central Limit Order Book (CLOB) and an incorrect bid/offer is accepted, every order would then be accepted or rejected relative to an incorrect existing market.

Conclusion

The IIAC and its members agree with the introduction of Top-of-the-Book Price Limits within the existing suite of controls and see these proposed price limits as good additional controls.

Please note that the IIAC and its members, as always, remain available for further consultations.

Yours sincerely,



Annie Sinigagliese
Managing Director
Investment Industry Association of Canada
asinigagliese@iiac.ca