



August 10, 2020

Attention:

Paige Ward
General Counsel, Corporate Secretary and Vice-President, Policy
Mutual Fund Dealers Association of Canada
121 King St. West, Suite 1000
Toronto, Ontario M5H 3T9
pward@mfda.ca

Anne Hamilton
Senior Legal Counsel
British Columbia Securities Commission
701 West Georgia Street
P.O. Box 10142, Pacific Centre
Vancouver, British Columbia, V7Y 1L2
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Re: Proposed Amendments MFDA Policy No. 9: Continuing Education (CE) Requirements (Bulletin #0818-P)

Dear Mrs. Ward/Mrs. Hamilton:

PFSL Investments Canada Ltd ("PFSL") appreciates the opportunity to provide our comments to the MFDA's Proposed Amendments MFDA Policy No. 9.

About Primerica

PFSL is a member of the Primerica Financial Services Canada group of Companies ("Primerica"). Primerica is a leading distributor of basic savings and protection products to middle-income households throughout Canada. In addition to PFSL, a mutual fund dealer, our Canadian corporate group includes a mutual fund manager (PFSL Management Ltd.) and a life insurance company (Primerica Life Insurance Company of Canada). Primerica has been serving the Canadian public since 1986. Our mutual fund dealer contracts with the largest independent mutual fund sales force in the country with almost 6,600 Approved Persons ("APs") and administers over \$14 billion of client investments, the vast majority of which serve the saving needs of middle-income Canadians. Our life insurance company contracts over 12,000 licensed life insurance agents across the country, protecting Canadian families with over \$120 billion of term life insurance.

Primerica dedicates its efforts to providing middle-income families with access to simple, yet essential products and service through one of the nation's largest and exclusive (captive) sales force. We consider our focus on middle-income Canadians one of the distinguishing features of our company since they are often overlooked by other financial service providers, particularly those providing personal advice. With this experience and a focus on preserving access to affordable financial products, we submit our comment to the MFDA.

General Comments

Primerica has a vested interest in ensuring APs update their skills and knowledge on an ongoing basis to meet their clients' needs in a fast-changing market. Implementing an appropriate and effective CE system is one way for the industry to ensure that APs continue to be qualified as mutual fund registered representatives. Primerica has shown interest in this matter and reflected it in our previous comment letters submitted to the MFDA on April 28, 2017, June 20, 2018, and September 18, 2019.

PART E: Accreditation

Third Parties Recognized by the MFDA

9.2 (b): PFSL is supportive of the MFDA's proposal to allow Members to self-accredit the CE activity of their APs. To ensure a robust CE program, we recommend the MFDA promote the availability of multiple Third Party Accreditors in the marketplace and not provide any single provider with a monopoly or predominant role in the accreditation process. As we have suggested in our previous comment letter, we believe a Third Party Accrerator should be objective and not an entity that uses the accreditation process to promote its position on the structure it believes is appropriate for the industry. The MFDA should only consider an entity as a Third Party Accrerator who accepts an unbiased and neutral position irrespective of different Member dealer structures.

CE Credits

9.3 (h): The MFDA's Proposal clarifies that 1 hour of training will equal 1 CE credit. However, we note dual registration is permitted by both insurance and the securities regulators, and APs may already be subject to other overlapping CE requirements. Where CE credits qualify as approved CE for life insurance licensees and are also approved for use by the MFDA, PFSL respectfully requests the MFDA consider allowing those credits to meet MFDA CE requirements. In other words, they should count for both licenses.

Member Self-Accreditation Reporting Requirement

9.4: PFSL is supportive of the decision to remove the requirement for Members to file self-accreditation reports to the MFDA.

Conclusion

We appreciate the opportunity to provide comments on these proposals. As always, we remain open to discussion and willing to work with the MFDA during the consultation and beyond.

Sincerely,

[Original Signed by]

John Adams, CPA, CA
Chief Executive Officer