



The Canadian Association of  
Independent Life Brokerage Agencies  
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General: 416-548-4223

August 9, 2021

Financial Services Regulatory Authority of Ontario  
5160 Yonge Street, 16th Floor  
Toronto, ON M2N 6L9

Dear Sirs/Mesdames,

**Re: Financial Services Regulatory Authority of Ontario  
Notice of Proposed Rule and Request for Comment  
Proposed Rule [2020-002], Unfair or Deceptive Acts or Practices**

CAILBA is a national industry association of life insurance intermediaries that helps our members to stay abreast of change and effectively implement compliance and regulatory updates. We work with our insurance carrier members to identify their expectations and provide education, knowledge, and tools to our members and their insurance brokers to help them stay current with industry best practices and technology. We provide a platform for our MGA members to collaborate and share ideas and best practices across Canada in order to better the industry and build unity in the MGA community nationally.

We thank you for the opportunity to provide additional input on the Proposed Rule, and for reflecting some of our initial commentary.

We would propose one clarifying change: adding the new subsection 7(2) to the end of clause 7(1)(vi) and adding the word "also" after the word "Rule", to reduce confusion about the applicability of 7(2) to 7(1) and to consolidate reference to automobile insurance into one clause.

As you suggest, we look forward to taking part in further stakeholder input and discussion on behalf of our CAILBA members on this very important issue."

Best regards,

Michael Williams,  
CAILBA President



**Michael Williams | CAILBA | President |**  
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