

FSRA Policy Team
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Delivered Electronically to Dan Padro

September 14, 2021

To the Readers,

FirstOntario participated in a detailed review of the proposed Sound Business Practice Rule with a working group composed of Meridian, Alterna, Libro, DUCA and FirstOntario (the “group of 5”). It is my understanding that the results of that review have been submitted to FSRA (the “group of 5 submission”) FirstOntario specifically reiterates its support for the group of 5 submission, and incorporates it hereto by reference.

Furthermore, section 14(1)2(i) uses the term risk based financial reporting. We suggest that this term is not commonly understood in the financial services industry. Therefore, we would request that it be defined to provide clarity as to expectations.

I also wanted to personally thank FSRA for taking the time to review the group of 5’s commentary in subsequent calls, and its commitment to review and revise the proposed rule based where appropriate based on the submission received and the conversations that took place.

Lastly, I would ask that FSRA give particular consideration to the transition period for this rule. The rule as currently proposed may require some significant changes to FirstOntario process and procedure. Accordingly we suggest that transition period of 36 months is appropriate in the circumstances.

Best,



Lloyd Smith, CPA, CGA, CCE Chief Executive Officer
FirstOntario Credit Union