

August 15, 2024

VIA EMAIL

British Columbia Securities Commission
Alberta Securities Commission
Financial and Consumer Affairs Authority of Saskatchewan
Ontario Securities Commission
Autorité des marchés financiers
Financial and Consumer Services Commission (New Brunswick)
Nova Scotia Securities Commission
Superintendent of Securities, Yukon
Superintendent of Securities, Northwest Territories

Dear Sirs/Mesdames:

Re: Proposed Amendments to Multilateral Instrument 25-102 *Designated Benchmarks and Benchmark Administrators*

This letter responds to the Notice and Request for Comment dated May 30, 2024 of the Canadian Securities Administrators (CSA) on proposed amendments to Multilateral Instrument 25-102 *Designated Benchmarks and Benchmark Administrators* (MI 25-102) and proposed changes to Companion Policy 25-102 *Designated Benchmarks and Benchmark Administrators* (**Proposed Amendments**). Terms not defined in this letter will have the same meaning given to them in the Proposed Amendments.

CanDeal Benchmark Administration Services Inc. (CBAS or we) welcome the opportunity to provide comments to the CSA. We appreciate the clarification in the Proposed Amendments regarding the timelines to conduct reasonable assurance reviews and for the public accounting firms to issue the reasonable assurance reports on controls for designated benchmark administrators. We also appreciate that the Proposed Amendments clarify that designated benchmark administrators may use the date of designation as a designated benchmark administrator as a reference date for the timelines to conduct the first reasonable assurance review.

Response to Question 1 in Annex E

1. The Proposed Amendments provide that a reasonable assurance report on controls must consider whether controls operated effectively over “the applicable period”. For the first reasonable assurance report on controls to be provided for a designated critical benchmark or a designated interest rate benchmark, the applicable period is specified to be



a 3-month “look back” period. Is the proposed 3-month “look back” period an appropriate period for the first reasonable assurance report on controls to be so provided?

CBAS believes that a 3-month “look back” period is appropriate for the first reasonable assurance report for a designated benchmark administrator. We are of the view that a designated benchmark administrator should not commence its operations without having implemented a solid set of baseline controls that operate effectively. While these controls may be augmented over time, they should be in place and ready to be tested in the first six months from the designation of the benchmark.

If you have any questions concerning these comments, please do not hesitate to contact us.

Yours sincerely,

“Ruxandra Smith”

Ruxandra Smith
Head of Regulatory Affairs
Candeal Group Inc.

cc: Andrew Munn, CBAS