

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 1A. Application, interpretation, exemptions and definitions	1A	"Approved Person"	R. 1201. Definitions	1201	(2) "Approved person"	No equivalent section (NES)	NES		R. 1201. Definitions	1201	(2) "Approved person"	Adopt a modified version of the existing IDPC Rule and MFD Rule definitions that results in the term having different meanings when applied to Investment Dealer Members and Mutual Fund Dealer Members. Modification for consistent drafting made to MFD Rule definition.
R. 2.5.3. Chief Compliance Officer	2.5.3	(b)	R. 1201. Definitions	1201	(2) "Chief Compliance Officer"	5. 5.2 Responsibilities of the chief compliance officer	5.2		R.1201. Definitions	1201	(2) "Chief Compliance Officer"	Adopt a modified version of existing IDPC Rule defined term which describes a specific Approved Person category used by both types of Dealer Members. Modification for consistent drafting made.
No equivalent section (NES)	NES		R. 1201. Definitions	1201	(2) "Chief Financial Officer"	No equivalent section (NES)	NES		R.1201. Definitions	1201	(2) "Chief Financial Officer"	Adopt a modified version of existing IDPC Rule defined term which describes a specific Approved Person category used by both types of Dealer Members. Modification for consistent drafting made.
No equivalent section (NES)	NES		R. 1201. Definitions	1201	(2) "Director"	No equivalent section (NES)	NES		R.1201. Definitions	1201	(2) "Director"	Adopt a modified version of existing IDPC Rule defined term which describes a specific Approved Person category used by both types of Dealer Members. Modifications for clarification and consistent drafting made.
No equivalent section (NES)	NES		R. 1201. Definitions	1201	(2) "Executive"	No equivalent section (NES)	NES		R.1201. Definitions	1201	(2) "Executive"	Adopt a modified version of existing IDPC Rule defined term which describes a specific Approved Person category used by both types of Dealer Members. Modification to clarify the types of individuals intended to be captures under this Approved Person category made.
No equivalent section (NES)	NES		R. 1201. Definitions	1201	(2) "Registered Representative"	Part 1 Interpretation	1.1	"registered individual"	R.1201. Definitions	1201	(2) "Registered Representative"	Adopt a modified version of the existing IDPC Rule and MFD Rule definitions that results in the term having different meanings when applied to Investment Dealer Members and Mutual Fund Dealer Members.
No equivalent section (NES)	NES		R. 1201. Definitions	1201	(2) "Supervisor"	No equivalent section (NES)	NES		R.1201. Definitions	1201	(2) "Supervisor"	Adopt a modified version of existing IDPC Rule defined term, which describes a specific Approved Person category used by both types of Dealer Members.
R. 2.5.2. Ultimate Designated Person	2.5.2	(b)	R. 1201. Definitions	1201	(2) "Ultimate Designated Person"	5. 5.1 Responsibilities of the ultimate designated person	5.1		R.1201. Definitions	1201	(2) "Ultimate Designated Person"	Adopt a modified version of existing IDPC Rule defined term, which describes a specific Approved Person category used by both types of Dealer Members. Modification for consistent drafting made.
No equivalent section (NES)	NES		R. 1501. Introduction	1501	(1)	No equivalent section (NES)	NES		R. 1501. Introduction	1501	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 1502. Responsibility for significant areas of risk	1502	(1)	No equivalent section (NES)	NES		R. 1502. Responsibility for significant areas of risk	1502	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 1502. Responsibility for significant areas of risk	1502	(2)	No equivalent section (NES)	NES		R. 1502. Responsibility for significant areas of risk	1502	(2)	Adopt existing IDPC Rule provision.
R. 2.10. Policies and Procedures Manual	2.10		R. 1502. Responsibility for significant areas of risk	1502	(3)	No equivalent section (NES)	NES		R. 1502. Responsibility for significant areas of risk	1502	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2501. Introduction	2501	(1)	No equivalent section (NES)	NES		R. 2501. Introduction	2501	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2501. Introduction	2501	(2)	No equivalent section (NES)	NES		R. 2501. Introduction	2501	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2502. General requirements for Directors	2502	(1)	No equivalent section (NES)	NES		R. 2502. General requirements for Directors	2502	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2502. General requirements for Directors	2502	(2)	No equivalent section (NES)	NES		R. 2502. General requirements for Directors	2502	(2)	Adopt a modified version of the existing IDPC Rule to align the requirements with the role of directors under corporate law and to impose the same proficiency requirements on Directors of both types of Dealer Members.
No equivalent section (NES)	NES		R. 2502. General requirements for Directors	2502	(3)	No equivalent section (NES)	NES		R. 2502. General requirements for Directors	2502	(3)	Adopt a modified version of the existing IDPC Rule to align the requirements with the role of directors under corporate law and to impose the same proficiency requirements on Directors of both types of Dealer Members.
No equivalent section (NES)	NES		R. 2503. General requirements for Executives	2503	(1)	No equivalent section (NES)	NES		R. 2503. General requirements for Executives	2503	(1)	Adopt a modified version of the existing IDPC Rule to impose the same proficiency requirements on Executives of both types of Dealer Members.
No equivalent section (NES)	NES		R. 2503. General requirements for Executives	2503	(2)	No equivalent section (NES)	NES		R. 2503. General requirements for Executives	2503	(2)	Adopt existing IDPC Rule provision.

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Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 2504. Exemption	2504	(1)	No equivalent section (NES)	NES		R. 2504. Exemption	2504	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(1)	No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(1)	Adopt a modified version of the existing IDPC Rule to impose the same proficiency requirements on Chief Financial Officers of both types of Dealer Members.
No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(2)	No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(3)	No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(4)	No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(4)	Adopt a modified version of the existing IDPC Rule to impose the same proficiency requirements on acting Chief Financial Officers of both types of Dealer Members.
No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(5)	No equivalent section (NES)	NES		R. 2505. Chief Financial Officer	2505	(5)	Adopt existing IDPC Rule provision.
R. 2.5.3. Chief Compliance Officer	2.5.3	(a)	R. 2506. Chief Compliance Officer	2506	(1)	S. 11.3 Designating a chief compliance officer	11.3	(1)-(2)	R. 2506. Chief Compliance Officer	2506	(1)	Adopt a modified version of the existing IDPC Rule to continue to impose the current proficiency requirements on Chief Compliance Officers.
No equivalent section (NES)	NES		R. 2506. Chief Compliance Officer	2506	(2)	No equivalent section (NES)	NES		R. 2506. Chief Compliance Officer	2506	(2)	Adopt a modified version of the existing IDPC Rule to make the provision applicable to Chief Compliance Officers of both types of Dealer Members.
No equivalent section (NES)	NES		R. 2506. Chief Compliance Officer	2506	(3)	No equivalent section (NES)	NES		R. 2506. Chief Compliance Officer	2506	(3)	Adopt the existing IDPC Rule provision, modified for clear drafting
R. 2.5.3. Chief Compliance Officer	2.5.3	(c)	R. 2506. Chief Compliance Officer	2506	(4)	S. 11.3 Designating a chief compliance officer	11.3	(3)	R. 2506. Chief Compliance Officer	2506	(4)	Adopt a modified version of the existing IDPC Rule to make clause 2506(4)(ii) only applicable to Investment Dealer Members, as Chief Compliance Officers of Mutual Fund Dealer Members remain subject to registration and proficiency requirements under NI 31-103.
R. 2.5.3. Chief Compliance Officer	2.5.3	(c)	R. 2506. Chief Compliance Officer	2506	(5)	S. 11.3 Designating a chief compliance officer	11.3	(3)	R. 2506. Chief Compliance Officer	2506	(5)	Adopt a modified version of the existing IDPC Rule to make the provision applicable to Chief Compliance Officers of both types of Dealer Members.
No equivalent section (NES)	NES		R. 2506. Chief Compliance Officer	2506	(6)	No equivalent section (NES)	NES		R. 2506. Chief Compliance Officer	2506	(6)	Adopt existing IDPC Rule provision.
R. 2.5.2. Ultimate Designated Person	2.5.2	(a)	R. 2507. Ultimate Designated Person	2507	(1)	S. 11.2 Designating an ultimate designated person	11.2	(1)	R. 2507. Ultimate Designated Person	2507	(1)	Adopt existing IDPC Rule provision.
R. 2.5.2. Ultimate Designated Person	2.5.2	(a)	R. 2507. Ultimate Designated Person	2507	(2)	S. 11.2 Designating an ultimate designated person	11.2	(2)	R. 2507. Ultimate Designated Person	2507	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2507. Ultimate Designated Person	2507	(3)	No equivalent section (NES)	NES		R. 2507. Ultimate Designated Person	2507	(3)	Adopt the existing IDPC Rule provision, modified for clear drafting
No equivalent section (NES)	NES		R. 2507. Ultimate Designated Person	2507	(4)	S. 11.2 Designating an ultimate designated person	11.2	(3)	R. 2507. Ultimate Designated Person	2507	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2550. Introduction	2550	(1)	No equivalent section (NES)	NES		R. 2550. Introduction	2550	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2550. Introduction	2550	(2)	No equivalent section (NES)	NES		R. 2550. Introduction	2550	(2)	Adopt existing IDPC Rule provision.
1.1.4 Employees, 1.1.5 Agents	1.1.4; 1.1.5		R. 2551. Individual approval	2551	(1)	S. 2.1 Individual categories, S. 3.15 Who must be approved by and SRO before registration	2.1; 3.15		R. 2551. Individual approval	2551	(1)	Adopt a modified version of the existing IDPC Rule to automatically approve the listed individuals registered in equivalent individual registration categories under NI 31-103
R. 1A. Application, interpretation, exemptions and definitions	1A	"Approved Person"	R. 2551. Individual approval	2551	(2)	No equivalent section (NES)	NES		R. 2551. Individual approval	2551	(2)	Adopt existing IDPC Rule provision.

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Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 1.1.2 Compliance by Members and Approved Persons,	1.1.2	(a)	R. 2551. Individual approval	2551	(3)	No equivalent section (NES)		NES	R. 2551. Individual approval	2551	(3)	Adopt existing IDPC Rule provision.
R. 1.2.1 Compliance with Corporation Requirements	1.2.1		R. 2551. Individual approval	2551	(3)	No equivalent section (NES)		NES	R. 2551. Individual approval	2551	(3)	Adopt existing IDPC Rule provision.
R. 1.1.2 Compliance by Members and Approved Persons	1.1.2	(b)	R. 2551. Individual approval	2551	(4)	No equivalent section (NES)		NES	R. 2551. Individual approval	2551	(4)	Adopt existing IDPC Rule provision.
R. 1.2.5 Misleading Communications	1.2.5		R. 2551. Individual approval	2551	(5)	S. 13.18 Misleading communications		13.18	R. 2551. Individual approval	2551	(5)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2551. Individual approval	2551	(6)	S. 6.2 If IIROC approval is revoked or suspended, S. 6.3 If MFDA approval is revoked or suspended		6.2; 6.3	R. 2551. Individual approval	2551	(6)	Adopt existing IDPC Rule provision.
R. 2.4.1. Remuneration, Commissions and Fees	2.4.1	(a)	R. 2551. Individual approval	2551	(7)	No equivalent section (NES)		NES	R. 2551. Individual approval	2551	(7)	Adopt the existing IDPC Rule provision, modified for clear drafting and updated reference.
R. 2.4.1. Remuneration, Commissions and Fees	2.4.1	(b)	R. 2551. Individual approval	2551	(8)	No equivalent section (NES)		NES	No equivalent section (NES)		NES	Repeal the provision, moved to DC Rule subsection 2302(3) in Phase 3
R. 2.4.1. Remuneration, Commissions and Fees	2.4.1	(c)	R. 2551. Individual approval	2551	(9)	No equivalent section (NES)		NES	No equivalent section (NES)		NES	Repeal the provision, moved to DC Rule subsection 2302(4) in Phase 3
R. 1.2.2 Registration	1.2.2		No equivalent section (NES)		NES	S. 2.1 Individual categories		2.1	R. 2552. Compliance with the proficiency requirements or other conditions	2552	(1)	Adopt a new provision to explicitly impose the obligation for Approved Persons to have satisfied the applicable proficiency and registration requirements set out in the applicable securities laws
No equivalent section (NES)	NES		R. 2552. Compliance with the proficiency requirements or other conditions	2552	(1)	No equivalent section (NES)		NES	R. 2552. Compliance with the proficiency requirements or other conditions	2552	(2)	Adopt the existing IDPC Rule provision, modified for clear drafting, renumbered to subsection 2552(2) and updated reference
No equivalent section (NES)	NES		R. 2552. Compliance with the proficiency requirements or other conditions	2552	(2)	No equivalent section (NES)		NES	R. 2552. Compliance with the proficiency requirements or other conditions	2552	(3)	Adopt the existing IDPC Rule provision, modified for clear drafting, renumbered to subsection 2552(3)
No equivalent section (NES)	NES		R. 2552. Compliance with the proficiency requirements or other conditions	2552	(3)	No equivalent section (NES)		NES	R. 2552. Compliance with the proficiency requirements or other conditions	2552	(4)	Adopt the existing IDPC Rule provision, modified for clear drafting, renumbered to subsection 2552(4)
No equivalent section (NES)	NES		R. 2552. Compliance with the proficiency requirements or other conditions	2552	(4)	No equivalent section (NES)		NES	R. 2552. Compliance with the proficiency requirements or other conditions	2552	(5)	Adopt existing IDPC Rule provision, renumbered to subsection 2552(5)
No equivalent section (NES)	NES		R. 2552. Compliance with the proficiency requirements or other conditions	2552	(5)	No equivalent section (NES)		NES	R. 2552. Compliance with the proficiency requirements or other conditions	2552	(6)	Adopt existing IDPC Rule provision, renumbered to subsection 2552(6) and with updated reference
No equivalent section (NES)	NES		R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(1)	No equivalent section (NES)		NES	R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(2)	No equivalent section (NES)		NES	R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(3)	No equivalent section (NES)		NES	R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(3)	Adopt the existing IDPC Rule provision with updated reference, further modified for clear drafting and to restrict its application to Investment Dealer Members only.
No equivalent section (NES)	NES		R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(4)	No equivalent section (NES)		NES	No equivalent section (NES)		NES	Repeal the provision, captured under section 2602
No equivalent section (NES)	NES		R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(5)	No equivalent section (NES)		NES	R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(4)	Adopt the existing IDPC Rule provision, renumbered to subsection 2553(4), modified for clear drafting and to restrict its application to Investment Dealer Members only.
No equivalent section (NES)	NES		R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations. R. 2553. Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations.	2553	(6)	No equivalent section (NES)		NES	No equivalent section (NES)		NES	Repeal the provision, captured under section 2602 and section 2552

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 1.3.2 Requirements for Outside Activity	1.3.2	(a) and (d)	R. 2554. The Approved Person's activities outside of the Dealer Member	2554	(1)	S. 13.4.1 Identifying, reporting and addressing material conflicts of interest – registered individual; 13.4.3 Registered firm's securities or assets	13.4.1; 13.4.3		R. 2554. The Approved Person's activities outside of the Dealer Member	2554	(1)	Adopt existing IDPC Rule provision.
R. 1.3.2 Requirements for Outside Activity	1.3.2	(a)-(c)	R. 2554. The Approved Person's activities outside of the Dealer Member	2554	(2)	S. 13.4.1 Identifying, reporting and addressing material conflicts of interest – registered individual; 13.4.3 Registered firm's securities or assets	13.4.1; 13.4.3		R. 2554. The Approved Person's activities outside of the Dealer Member	2554	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2554. The Approved Person's activities outside of the Dealer Member	2554	(3)	S.4.1 Restriction on acting for another registered firm	4.1		R. 2554. The Approved Person's activities outside of the Dealer Member	2554	(3)	Adopt existing IDPC Rule provision.
R. 8.4 Ownership	8.4		R. 2555. Approval of investors	2555	(1)	S. 11.9. Registrant acquiring a registered firm's securities or assets; S. 11.10. Registered firm whose securities are acquired	11.9; 11.10		R. 2555. Approval of investors	2555	(1)	Adopt existing IDPC Rule provision.
R. 8.4 Ownership	8.4		R. 2555. Approval of investors	2555	(2)	S. 11.9. Registrant acquiring a registered firm's securities or assets; S. 11.10. Registered firm whose securities are acquired	11.9; 11.10		R. 2555. Approval of investors	2555	(2)	Adopt existing IDPC Rule provision.
R. 8.4 Ownership	8.4		R. 2555. Approval of investors	2555	(3)	No equivalent section (NES)	NES		R. 2555. Approval of investors	2555	(3)	Adopt a modified version of the existing IDPC Rule provision to make it applicable to investors of both types of Dealer Members
No equivalent section (NES)	NES		R. 2601. Introduction	2601	(1)	No equivalent section (NES)	NES		R. 2601. Introduction	2601	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2601. Introduction	2601	(2)	No equivalent section (NES)	NES		R. 2601. Introduction	2601	(2)	Adopt existing IDPC Rule provision, with updated reference
R. 1.2.3. Education, Training and Experience	1.2.3		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(1)	S. 3.4 Proficiency - initial and ongoing	3.4		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(2)	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)	Adopt the existing IDPC Rule provision, modified for clear drafting
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3) Preamble table with categories	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3) Preamble table with categories	Adopt the existing IDPC table, with added categories for Mutual Fund Dealer Members' Approved Persons and to reflect changes made to the second table.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(i) Registered Representative dealing with retail clients (other than a Registered Representative dealing in derivatives or only in mutual funds)	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(i) Registered Representative dealing with retail clients (other than a Registered Representative dealing in derivatives or only in mutual funds)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(ii) Registered Representative dealing with institutional clients (other than a Registered Representative dealing in derivatives or only in mutual funds)	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(ii) Registered Representative dealing with institutional clients (other than a Registered Representative dealing in derivatives or only in mutual funds)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(iii) Registered Representative dealing in options or similar derivatives with retail clients	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(iii) Registered Representative dealing in options or similar derivatives with retail clients	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(iv) Registered Representative dealing in options or similar derivatives with institutional clients	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(iv) Registered Representative dealing in options or similar derivatives with institutional clients	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(v) Registered Representative dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives with retail clients or institutional clients	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(v) Registered Representative dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives with retail clients or institutional clients	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(vi) Registered Representative dealing only in mutual funds who is an employee of a firm registered as an investment dealer and not registered as a mutual fund dealer	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(vi) Registered Representative dealing only in mutual funds who is an employee of a firm registered as an investment dealer and not registered as a mutual fund dealer	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(vii) Registered Representative dealing only in mutual funds who is an employee of a firm registered as both an investment dealer and a mutual fund dealer	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(vii) Registered Representative dealing only in mutual funds who is an employee of a firm registered as both an investment dealer and a mutual fund dealer	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(viii) Investment Representative dealing with retail clients (other than an Investment Representative dealing in derivatives or only in mutual funds)	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(viii) Investment Representative dealing with retail clients (other than an Investment Representative dealing in derivatives or only in mutual funds)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Proposed Action
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(ix) Investment Representative dealing with institutional clients (other than an Investment Representative dealing in derivatives or dealing only in mutual funds)	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(ix) Investment Representative dealing with institutional clients (other than an Investment Representative dealing in derivatives or dealing only in mutual funds)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(ix) Investment Representative dealing in options or similar derivatives with retail clients	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(x) Investment Representative dealing in options or similar derivatives with retail clients	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xi) Investment Representative dealing in options or similar derivatives with institutional clients	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xi) Investment Representative dealing in options or similar derivatives with institutional clients	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xii) Investment Representative dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives with institutional clients or	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xii) Investment Representative dealing in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives with retail clients or institutional clients	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xiii) Investment Representative dealing only in mutual funds who is an employee of a firm registered as an investment dealer and not registered as a mutual fund dealer	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xiii) Investment Representative dealing only in mutual funds who is an employee of a firm registered as an investment dealer and not registered as a mutual fund dealer	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xiv) Associate Portfolio Manager providing discretionary portfolio management for managed accounts	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xiv) Associate Portfolio Manager providing discretionary portfolio management for managed accounts	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xv) Portfolio Manager providing discretionary portfolio management for managed accounts	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xv) Portfolio Manager providing discretionary portfolio management for managed accounts	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xvi) Trader	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xvi) Trader	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xvii) Trader on the Montréal Exchange	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xvii) Trader on the Montréal Exchange	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xviii) Supervisor of Registered Representatives or Investment Representatives (other than supervising derivatives)	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xviii) Supervisor of Registered Representatives or Investment Representatives (except those dealing with clients in derivatives)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xix) Supervisor of Registered Representatives or Investment Representatives dealing with clients in options or similar derivatives	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xix) Supervisor of Registered Representatives or Investment Representatives dealing with clients in options or similar derivatives	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xx) Supervisor of Registered Representatives or Investment Representatives dealing with clients in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xx) Supervisor of Registered Representatives or Investment Representatives dealing with clients in futures contracts, forward contracts, contracts for difference, futures contract options or similar derivatives	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxi) Supervisor designated to be responsible for the opening of new accounts and account supervision and activity related policies and procedures	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxi) Supervisor responsible for the opening of new accounts and account supervision and activity related policies and procedures	Adopt modified IDPC Rule provision to accommodate for the deletion of the term "Designated Supervisor"
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxii) Supervisor designated to be responsible for the supervision of discretionary accounts	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxii) Supervisor responsible for the supervision of discretionary accounts	Adopt modified IDPC Rule provision to accommodate for the deletion of the term "Designated Supervisor"
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxiii) Supervisor designated to be responsible for the supervision of managed accounts	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxiii) Supervisor responsible for the supervision of managed accounts	Adopt modified IDPC Rule provision to accommodate for the deletion of the term "Designated Supervisor"
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxiv) Supervisor designated to be responsible for the supervision of option and similar derivative accounts	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxiv) Supervisor responsible for the supervision of option and similar derivative accounts	Adopt modified IDPC Rule provision to accommodate for the deletion of the term "Designated Supervisor"
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxv) Supervisor designated to be responsible for the supervision of futures contract, forward contract, contract for difference, futures contract option and similar derivative accounts	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxv) Supervisor responsible for the supervision of futures contract, forward contract, contract for difference, futures contract option and similar derivative accounts	Adopt modified IDPC Rule provision to accommodate for the deletion of the term "Designated Supervisor"
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxvi) Supervisor designated to be responsible for the pre-approval of advertising, sales literature and correspondence	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxvi) Supervisor responsible for the pre-approval of advertisements, sales communications and client communications	Adopt modified IDPC Rule provision to accommodate for the deletion of the term "Designated Supervisor" and to replace "advertising", "sales literature" and "correspondence" with the terms "advertisements", "sales communications" and "client communications"
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxvii) Supervisor responsible for the supervision of research reports	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxvii) Supervisor responsible for the supervision of research reports	Adopt modified IDPC Rule provision to accommodate for the deletion of the term "Designated Supervisor"
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxviii) Executive (including Ultimate Designated Person)	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxviii) Executive	Adopt the existing IDPC Rule provision, modified to no longer refer to Ultimate Designated Persons, as this category is added under 2602(3)(xxii)

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxix) Director	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxix) Director (where required per section 2502)	Adopt the existing IDPC Rule provision, modified for clear drafting
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxx) Chief Financial Officer	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxx) Chief Financial Officer	Adopt existing IDPC Rule provision
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxi) Chief Compliance Officer	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxi) Chief Compliance Officer	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxii) Ultimate Designated Person	Adopt a new clause specifically for Investment Dealers' Ultimate Designated Persons, which refers back to clause 2602(3)(xxvii) for the requirements
No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxii) Approved investor (under subsections 2555(2) and 2555(3))	No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxiii) Approved investor (under subsections 2555(2) and 2555(3))	Adopt existing IDPC Rule provision, renumbered to clause 2602(3)(xxxiii)
R. 1.2.2 Registration	1.2.2		No equivalent section (NES)	NES		S. 3.5 Mutual fund dealer – dealing representative	3.5		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3) (xxxiv) Registered Representative (a)	Adopt new provision to incorporate current general pre-approval proficiency requirements for Mutual Fund Dealer Member Registered Representatives
R. 800 Proficiency standard for Approved Persons selling Exchange Traded Funds ("ETFs")	800		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3) (xxxiv) Registered Representative (b)	Adopt new provision to incorporate current pre-approval proficiency requirements for Mutual Fund Dealer Member Registered Representatives selling Exchange Traded Funds
R. 1000 Proficiency standards for the sale of alternative mutual funds	1000		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3) (xxxiv) Registered Representative (c)	Adopt new provision to incorporate current pre-approval proficiency requirements for Mutual Fund Dealer Member Registered Representatives selling Alternative Mutual Funds
R. 1.2.2 Registration	1.2.2		No equivalent section (NES)	NES		S. 3.5 Mutual fund dealer – dealing representative	3.5		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3) (xxxiv) Registered Representative (d)	Adopt new provision to incorporate current post-approval proficiency requirements for Mutual Fund Dealer Member Registered Representatives
R. 1.2.2 Registration	1.2.2		No equivalent section (NES)	NES		S. 3.5 Mutual fund dealer – dealing representative	3.5		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3) (xxxiv) Registered Representative (e)	Adopt new provision to incorporate current experience and other proficiency related requirements for Mutual Fund Dealer Member Registered Representatives
R. 2.5.5 Branch Manager	2.5.5		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxv) Supervisor	Adopt new provision to incorporate current proficiency requirements for Mutual Fund Dealer Member Registered Branch Managers under the Supervisor category
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxvi) Executive	Adopt new provision to apply current Executive proficiency requirements across Dealer Members, specifying that Mutual Fund Dealer Members' UDRs and CCOs will not be required to fulfill these, as they will be approved as Executive upon their securities registration as UDR and CCO
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxvii) Director (where required per section 2502)	Adopt new provision to impose the same proficiency requirements for Directors to both types of Dealer Members
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxviii) Chief Financial Officer	Adopt new provision to impose the same proficiency requirements for Chief Financial Officers to both types of Dealer Members
R. 1.2.2 Registration	1.2.2		No equivalent section (NES)	NES		S. 3.6 Mutual fund dealer – chief compliance officer	3.6		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xxxix) Chief Compliance Officer	Adopt new provision to incorporate current proficiency requirements for Mutual Fund Dealer Member Chief Compliance Officers
R. 1.2.2 Registration	1.2.2		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xl) Ultimate Designated Person	Adopt new provision to incorporate current proficiency requirements for Mutual Fund Dealer Member Ultimate Designated Persons
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 2602. Proficiency requirements for Approved Persons and approved investors	2602	(3)(xli) Approved investor (under subsections 2555(2) and 2555(3))	Adopt new provision to impose the same proficiency requirements for Approved Investors to both types of Dealer Members
No equivalent section (NES)	NES		R. 2603. Permitted activities of mutual funds only Registered Representatives and Investment representatives	2603	(1)	No equivalent section (NES)	NES		R. 2603. Permitted activities of mutual funds only Registered Representatives and Investment representatives	2603	(1)	Adopt modified IDPC Rule provision to restrict application to Investment Dealer Members
No equivalent section (NES)	NES		R. 2603. Permitted activities of mutual funds only Registered Representatives and Investment representatives	2603	(2)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal the provision, captured under section 2602
No equivalent section (NES)	NES		R. 2603. Permitted activities of mutual funds only Registered Representatives and Investment representatives	2603	(3)	No equivalent section (NES)	NES		R. 2603. Permitted activities of mutual funds only Registered Representatives and Investment representatives	2603	(3)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 2603. Permitted activities of mutual funds only Registered Representatives and Investment representatives	2603	(4)	No equivalent section (NES)	NES		R. 2603. Permitted activities of mutual funds only Registered Representatives and Investment representatives	2603	(4)	Adopt modified IDPC Rule provision to restrict application to Investment Dealer Members
No equivalent section (NES)	NES		R. 2625. Specific exemptions	2625	(1)	No equivalent section (NES)	NES		R. 2625. Specific exemptions	2625	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2625. Specific exemptions	2625	(2)	No equivalent section (NES)	NES		R. 2625. Specific exemptions	2625	(2)	Adopt modified IDPC Rule provision to restrict application to Investment Dealer Members' Supervisors per the modified Approved Person regime, modified for clear drafting
No equivalent section (NES)	NES		R. 2625. Specific exemptions	2625	(3)	No equivalent section (NES)	NES		R. 2625. Specific exemptions	2625	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2626. General and discretionary exemptions	2626	(1)	No equivalent section (NES)	NES		R. 2626. General and discretionary exemptions	2626	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2626. General and discretionary exemptions	2626	(2)	No equivalent section (NES)	NES		R. 2626. General and discretionary exemptions	2626	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2626. General and discretionary exemptions	2626	(3)	No equivalent section (NES)	NES		R. 2626. General and discretionary exemptions	2626	(3)	Adopt existing IDPC Rule provision.
R. 1.2.4 Training and Supervision	1.2.4	(2)	R. 2627. Exemptions from completing the required courses	2627	(1)	No equivalent section (NES)	NES		R. 2627. Exemptions from completing the required courses	2627	(1)	Adopt the existing IDPC Rule provision, modified for clear drafting
R. 2.5.6 Currency of Examination	2.5.6		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(1)	S. 3.3 Time limits on examination requirements	3.3	(1)-(2)	R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(1)	Adopt existing IDPC Rule provision.
R. 2.5.6 Currency of Examination	2.5.6		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(2)	S. 3.3 Time limits on examination requirements	3.3	(1)-(2)	R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(3)	S. 3.1 Definitions	3.1		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(4)	S. 3.3 Time limits on examination requirements	3.3	(3)	R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(5)	No equivalent section (NES)	NES		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(5)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(6)	No equivalent section (NES)	NES		R. 2628. Course validity and exemptions from rewriting or repeating courses	2628	(6)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval. R. 2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval.	2630	(1)	No equivalent section (NES)	NES		R. 2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval. R. 2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval.	2630	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval. R. 2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval.	2630	(2)	No equivalent section (NES)	NES		R. 2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval. R. 2630. Transition of Advising Representatives and Associate Advising Representatives into the Portfolio Manager and Associate Portfolio Manager approval.	2630	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2801. Introduction	2801	(1)	No equivalent section (NES)	NES		R. 2801. Introduction	2801	(1)	Adopt existing IDPC Rule provision, with typographic correction
No equivalent section (NES)	NES		R. 2801. Introduction	2801	(2)	No equivalent section (NES)	NES		R. 2801. Introduction	2801	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2802. Definitions	2802	(1)	No equivalent section (NES)	NES		R. 2802. Definitions	2802	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2803. Dealer Member obligations for the National Registration Database	2803	(1)	No equivalent section (NES)	NES		R. 2803. Dealer Member obligations for the National Registration Database	2803	(1)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 2803. Dealer Member obligations for the National Registration Database	2803	(2)	No equivalent section (NES)	NES		R. 2803. Dealer Member obligations for the National Registration Database	2803	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2804. Temporary hardship exemption	2804	(1)	No equivalent section (NES)	NES		R. 2804. Temporary hardship exemption	2804	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2804. Temporary hardship exemption	2804	(2)	No equivalent section (NES)	NES		R. 2804. Temporary hardship exemption	2804	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2804. Temporary hardship exemption	2804	(3)	No equivalent section (NES)	NES		R. 2804. Temporary hardship exemption	2804	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2805. Due diligence and record keeping	2805	(1)	No equivalent section (NES)	NES		R. 2805. Due diligence and record keeping	2805	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2805. Due diligence and record keeping	2805	(2)	No equivalent section (NES)	NES		R. 2805. Due diligence and record keeping	2805	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2805. Due diligence and record keeping	2805	(3)	No equivalent section (NES)	NES		R. 2805. Due diligence and record keeping	2805	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2805. Due diligence and record keeping	2805	(4)	No equivalent section (NES)	NES		R. 2805. Due diligence and record keeping	2805	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2806. Fees	2806	(1)	No equivalent section (NES)	NES		R. 2806. Fees	2806	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2806. Fees	2806	(2)	No equivalent section (NES)	NES		R. 2806. Fees	2806	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2806. Fees	2806	(3)	No equivalent section (NES)	NES		R. 2806. Fees	2806	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2807. Cessation of Approved Person status	2807	(1)	No equivalent section (NES)	NES		R. 2807. Cessation of Approved Person status	2807	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2807. Cessation of Approved Person status	2807	(2)	No equivalent section (NES)	NES		R. 2807. Cessation of Approved Person status	2807	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2807. Cessation of Approved Person status	2807	(3)	No equivalent section (NES)	NES		R. 2807. Cessation of Approved Person status	2807	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2807. Cessation of Approved Person status	2807	(4)	No equivalent section (NES)	NES		R. 2807. Cessation of Approved Person status	2807	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 2808. Reinstatement of Approved Persons	2808	(1)	No equivalent section (NES)	NES		R. 2808. Reinstatement of Approved Persons	2808	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3101. Introduction	3101	(1)	No equivalent section (NES)	NES		R. 3101. Introduction	3101	(1)	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3101. Introduction	3101	(2) Part A	No equivalent section (NES)	NES		R. 3101. Introduction	3101	(2) Part A	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3101. Introduction	3101	(2) Part B	No equivalent section (NES)	NES		R. 3101. Introduction	3101	(2) Part B	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3102. Business conduct	3102	(1)	No equivalent section (NES)	NES		R. 3102. Business conduct	3102	(1)	Adopt existing IDPC Rule provision with a clear drafting modification.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.1.4 Identifying, addressing and disclosing material conflicts of interest - Member	2.1.4	(1)(h)	R. 3113. Responsibility to disclose conflicts of interest	3113	(3)	S. 13.4. Identifying, addressing and disclosing material conflicts of interest - registered firm	13.4	(8)	R. 3108. Responsibility to disclose conflicts of interest	3108	(3)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3114. Conflicts of interest policies and procedures	3114	(1)	No equivalent section (NES)	NES		R. 3109. Conflicts of interest policies and procedures	3109	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3115. Personal financial dealings	3115	(1)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12		R. 3110. Personal financial dealings	3110	(1)	Adopt existing IDPC Rule provision.
R. 2.4.1 Payable by Member Only	2.4.1	(a)	R. 3115. Personal financial dealings	3115	(2)(i)(a)(I)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12		R. 3110. Personal financial dealings	3110	(2)(i)(a)(I)	Adopt existing IDPC Rule provision with numbering reference modification.
R. 2.4.1 Payable by Member Only	2.4.1	(a)	R. 3115. Personal financial dealings	3115	(2)(i)(a)(II)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12		R. 3110. Personal financial dealings	3110	(2)(i)(a)(II)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3115. Personal financial dealings	3115	(2)(ii)(a)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12		R. 3110. Personal financial dealings	3110	(2)(ii)(a)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3115. Personal financial dealings	3115	(2)(ii)(b)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12		R. 3110. Personal financial dealings	3110	(2)(ii)(b)	Adopt existing IDPC Rule provision.
R. 2.1.5 Borrowing From Clients	2.1.5		R. 3115. Personal financial dealings	3115	(2)(iii)(a)(I)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12	(2)(a)	R. 3110. Personal financial dealings	3110	(2)(iii)(a)(I)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.1.5 Borrowing From Clients	2.1.5		R. 3115. Personal financial dealings	3115	(2)(iii)(a)(II)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12	(2)(b)(I)	R. 3110. Personal financial dealings	3110	(2)(iii)(a)(II)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.1.5 Borrowing From Clients	2.1.5		R. 3115. Personal financial dealings	3115	(2)(iii)(a)(III)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12	(2)(b)(ii)	R. 3110. Personal financial dealings	3110	(2)(iii)(a)(III)	Adopt existing IDPC Rule provision with addition of investment products defined term. and numbering reference modification.
R. 3.2.1 Client Lending and Margin	3.2.1	(b)(I)	R. 3115. Personal financial dealings	3115	(2)(iv)(a)(I)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12	(1)(c)(I)	R. 3110. Personal financial dealings	3110	(2)(iv)(a)(I)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 3.2.1 Client Lending and Margin	3.2.1	(b)(II)	R. 3115. Personal financial dealings	3115	(2)(iv)(a)(II)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12	(1)(c)(II)	R. 3110. Personal financial dealings	3110	(2)(iv)(a)(II)	Adopt existing IDPC Rule provision with addition of investment products defined term. and numbering reference modification.
R. 2.3.1 Control or Authority	2.3.1	(c)(I)	R. 3115. Personal financial dealings	3115	(2)(v)(a)(I)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12		R. 3110. Personal financial dealings	3110	(2)(v)(a)(I)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 2.3.1 Control or Authority	2.3.1	(c)(I)-(c)(II)	R. 3115. Personal financial dealings	3115	(2)(v)(a)(II)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12		R. 3110. Personal financial dealings	3110	(2)(v)(a)(II)	Adopt existing IDPC Rule provision with a clear drafting and numbering reference modification.
R. 2.3.1 Control or Authority	2.3.1	(b)	R. 3115. Personal financial dealings	3115	(2)(v)(b)	S. 13.12. Restriction on borrowing from, or lending to, clients	13.12		R. 3110. Personal financial dealings	3110	(2)(v)(b)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3110. Personal financial dealings	3110	(2)(v)(a)	Adopt new provision regarding beneficiary status and estate bequests.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3110. Personal financial dealings	3110	(2)(v)(b)(II)	Adopt new provision regarding beneficiary status and estate bequests.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3110. Personal financial dealings	3110	(2)(v)(b)(I)	Adopt new provision regarding beneficiary status and estate bequests.
No equivalent section (NES)	NES		R. 3116. Offering gratuity	3116	(1)	No equivalent section (NES)	NES		R. 3111. Offering gratuity	3111	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3116. Offering gratuity	3116	(2)	No equivalent section (NES)	NES		R. 3111. Offering gratuity	3111	(2)	Adopt existing IDPC Rule provision with numbering reference modification.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3117. Mutual fund sales incentives	3117	(1)	No equivalent section (NES)	NES		R. 3112. Mutual fund sales incentives	3112	(1)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3117. Mutual fund sales incentives	3117	(2)	No equivalent section (NES)	NES		R. 3112. Mutual fund sales incentives	3112	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3117. Mutual fund sales incentives	3117	(3)(i)	No equivalent section (NES)	NES		R. 3112. Mutual fund sales incentives	3112	(3)(i)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3117. Mutual fund sales incentives	3117	(3)(ii)	No equivalent section (NES)	NES		R. 3112. Mutual fund sales incentives	3112	(3)(ii)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3117. Mutual fund sales incentives	3117	(3)(iii)	No equivalent section (NES)	NES		R. 3112. Mutual fund sales incentives	3112	(3)(iii)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3117. Mutual fund sales incentives	3117	(3)(iv)	No equivalent section (NES)	NES		R. 3112. Mutual fund sales incentives	3112	(3)(iv)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3117. Mutual fund sales incentives	3117	(3)(v)	No equivalent section (NES)	NES		R. 3112. Mutual fund sales incentives	3112	(3)(v)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3118. Tied selling	3118	(1)	S. 11.8. Tied selling	11.8		R. 3113. Tied selling	3113	(1)	Adopt existing IDPC Rule provision with a clear drafting modification including use of the investment product definition.
No equivalent section (NES)	NES		R. 3118. Tied selling	3118	(2)	S. 11.8. Tied selling	11.8		R. 3113. Tied selling	3113	(2)	Adopt existing IDPC Rule provision with numbering reference modification.
R. 2.4.2 Referral Arrangements	2.4.2	(a)(i)	No equivalent section (NES)	NES		S. 13.7. Definitions – referral arrangements	13.7	"client"	R. 3114. Referral Arrangements	3114	(1) "client"	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(a)(ii)	No equivalent section (NES)	NES		S. 13.7. Definitions – referral arrangements	13.7	"referral arrangement"	R. 3114. Referral Arrangements	3114	(1) "referral arrangement"	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(a)(iii)	No equivalent section (NES)	NES		S. 13.7. Definitions – referral arrangements	13.7	"referral fee"	R. 3114. Referral Arrangements	3114	(1) "referral fee"	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(b)(i)	No equivalent section (NES)	NES		S. 13.8. Permitted referral arrangements	13.8	(a)	R. 3114. Referral Arrangements	3114	(2)(i)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(b)(ii)	No equivalent section (NES)	NES		S. 13.8. Permitted referral arrangements	13.8	(b)	R. 3114. Referral Arrangements	3114	(2)(ii)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(b)(iii)	No equivalent section (NES)	NES		S. 13.8. Permitted referral arrangements	13.8	(c)	R. 3114. Referral Arrangements	3114	(2)(iii)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(c)	No equivalent section (NES)	NES		S. 13.9. Verifying the qualifications of the person receiving the referral	13.9		R. 3114. Referral Arrangements	3114	(3)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(d)(i)(A)	No equivalent section (NES)	NES		S. 13.10. Disclosing referral arrangements to clients	13.10	(1)(a)	R. 3114. Referral Arrangements	3114	(4)(i)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(d)(i)(B)	No equivalent section (NES)	NES		S. 13.10. Disclosing referral arrangements to clients	13.10	(1)(b)	R. 3114. Referral Arrangements	3114	(4)(ii)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(d)(i)(C)	No equivalent section (NES)	NES		S. 13.10. Disclosing referral arrangements to clients	13.10	(1)(c)	R. 3114. Referral Arrangements	3114	(4)(iii)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(d)(i)(D)	No equivalent section (NES)	NES		S. 13.10. Disclosing referral arrangements to clients	13.10	(1)(d)	R. 3114. Referral Arrangements	3114	(4)(iv)	Adopt referral arrangements provision similar to that of NI 31-103.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.4.2 Referral Arrangements	2.4.2	(d)(i)(E)	No equivalent section (NES)	NES		S. 13.10. Disclosing referral arrangements to clients	13.10	(1)(e)	R. 3114. Referral Arrangements	3114	(4)(v)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(d)(i)(F)	No equivalent section (NES)	NES		S. 13.10. Disclosing referral arrangements to clients	13.10	(1)(f)	R. 3114. Referral Arrangements	3114	(4)(vi)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(d)(i)(G)	No equivalent section (NES)	NES		S. 13.10. Disclosing referral arrangements to clients	13.10	(1)(g)	R. 3114. Referral Arrangements	3114	(4)(vii)	Adopt referral arrangements provision similar to that of NI 31-103.
R. 2.4.2 Referral Arrangements	2.4.2	(d)(ii)	No equivalent section (NES)	NES		S. 13.10. Disclosing referral arrangements to clients	13.10	(2)	R. 3114. Referral Arrangements	3114	(5)	Adopt referral arrangements provision similar to that of NI 31-103.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3115 - 3118. Reserved.	3115 - 3118		Adopt renumbered reserved series.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part A	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part A	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part B	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part B	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part C	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part C	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part D	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part D	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part E	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part E	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part F	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part F	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part G	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(1) Part G	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(2)	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(2)	Adopt existing IDPC Rule provision.
R. 2.2 Client Accounts	2.2	"financial exploitation"	R. 3201. Introduction	3201	(3) "financial exploitation"	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(3) "financial exploitation"	Adopt existing IDPC Rule provision.
R. 2.2 Client Accounts	2.2	"trusted contact person"	R. 3201. Introduction	3201	(3) "trusted contact person"	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(3) "trusted contact person"	Adopt existing IDPC Rule provision.
R. 2.2 Client Accounts	2.2	"vulnerable client"	R. 3201. Introduction	3201	(3) "vulnerable client"	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(3) "vulnerable client"	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(4) "adviser"	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(4) "adviser"	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3201. Introduction	3201	(4) "foreign adviser equivalent"	No equivalent section (NES)	NES		R. 3201. Introduction	3201	(4) "foreign adviser equivalent"	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(a)	R. 3202. Know-Your-Client	3202	(1)(i)	S. 13.2. Know your client	13.2	(2)(a)	R. 3202. Know-Your-Client	3202	(1)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3202. Know-Your-Client	3202	(1)(ii)	S. 13.2. Know your client	13.2	(2)(b)	R. 3202. Know-Your-Client	3202	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.2.1 Know-Your-Client	2.2.1	(1)(b)(i)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(i)	S. 13.2. Know your client	13.2	(2)(c)(i)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(i)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(b)(ii)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(ii)	S. 13.2. Know your client	13.2	(2)(c)(ii)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(ii)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(b)(iii)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(iii)	S. 13.2. Know your client	13.2	(2)(c)(iii)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(iii)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(b)(iv)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(iv)	S. 13.2. Know your client	13.2	(2)(c)(iv)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(iv)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(b)(v)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(v)	S. 13.2. Know your client	13.2	(2)(c)(v)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(v)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(b)(vi)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(vi)	S. 13.2. Know your client	13.2	(2)(c)(vi)	R. 3202. Know-Your-Client	3202	(1)(iii)(a)(vi)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3202. Know-Your-Client	3202	(1)(iv)	S. 13.2. Know your client	13.2	(2)(d)	R. 3202. Know-Your-Client	3202	(1)(iv)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.2.2. New Accounts	2.2.2	(a)-(b)	R. 3202. Know-Your-Client	3202	(2)	No equivalent section (NES)	NES		R. 3202. Know-Your-Client	3202	(2)	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3202. Know-Your-Client	3202	(3)	S. 13.2. Know your client	13.2	(3.1)	R. 3202. Know-Your-Client	3202	(3)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(c)(i)	R. 3202. Know-Your-Client	3202	(4)(i)	S. 13.2.01. Know your client - trusted contact person	13.2.01	(1)(a)	R. 3202. Know-Your-Client	3202	(4)(i)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(c)(ii)	R. 3202. Know-Your-Client	3202	(4)(ii)	S. 13.2.01. Know your client - trusted contact person	13.2.01	(1)(b)	R. 3202. Know-Your-Client	3202	(4)(ii)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(c)(iii)	R. 3202. Know-Your-Client	3202	(4)(iii)	S. 13.2.01. Know your client - trusted contact person	13.2.01	(1)(c)	R. 3202. Know-Your-Client	3202	(4)(iii)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(c)(iv)	R. 3202. Know-Your-Client	3202	(4)(iv)	S. 13.2.01. Know your client - trusted contact person	13.2.01	(1)(d)	R. 3202. Know-Your-Client	3202	(4)(iv)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(1)(d)	R. 3202. Know-Your-Client	3202	(5)	S. 13.2.01. Know your client - trusted contact person	13.2.01	(3)	R. 3202. Know-Your-Client	3202	(5)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(2)	R. 3203. Identifying partnerships or trusts	3203	(1)(i)	S. 13.2. Know your client	13.2	(3)	R. 3203. Identifying partnerships or trusts	3203	(1)(i)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(2)	R. 3203. Identifying partnerships or trusts	3203	(1)(ii)	S. 13.2. Know your client	13.2	(3)	R. 3203. Identifying partnerships or trusts	3203	(1)(ii)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(2)	R. 3203. Identifying partnerships or trusts	3203	(1)(iii)	S. 13.2. Know your client	13.2	(3)	R. 3203. Identifying partnerships or trusts	3203	(1)(iii)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(2)	R. 3203. Identifying partnerships or trusts	3203	(1)(iv)	S. 13.2. Know your client	13.2	(3)	R. 3203. Identifying partnerships or trusts	3203	(1)(iv)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
R. 2.2.1 Know-Your-Client	2.2.1	(2)	R. 3204. Identifying corporations	3204	(1)(i)	S. 13.2. Know your client	13.2	(3)	R. 3204. Identifying corporations	3204	(1)(i)	Adopt existing IDPC Rule provision.
R. 2.2.1 Know-Your-Client	2.2.1	(2)(a)	R. 3204. Identifying corporations	3204	(1)(ii)	S. 13.2. Know your client	13.2	(3)	R. 3204. Identifying corporations	3204	(1)(ii)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.2.1 Know-Your-Client	2.2.1	(2)(b)	R. 3204. Identifying corporations	3204	(1)(iii)	S. 13.2. Know your client	13.2	(3)	R. 3204. Identifying corporations	3204	(1)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3204. Identifying corporations	3204	(1)(iv)	S. 13.2. Know your client	13.2	(3)	R. 3204. Identifying corporations	3204	(1)(iv)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3205. Prohibition on shell banks	3205	(1)	No equivalent section (NES)	NES		R. 3205. Prohibition on shell banks	3205	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3205. Prohibition on shell banks	3205	(2)	No equivalent section (NES)	NES		R. 3205. Prohibition on shell banks	3205	(2)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II.)(4.)	R. 3206. Establishing identity	3206	(1)	No equivalent section (NES)	NES		R. 3206. Establishing identity	3206	(1)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 200 Minimum Standards for Account Supervision	200	(II.)(4.)	R. 3206. Establishing identity	3206	(2)	No equivalent section (NES)	NES		R. 3206. Establishing identity	3206	(2)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 200 Minimum Standards for Account Supervision	200	(II.)(4.)	R. 3206. Establishing identity	3206	(3)	No equivalent section (NES)	NES		R. 3206. Establishing identity	3206	(3)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II.)(4.)	R. 3206. Establishing identity	3206	(4)	No equivalent section (NES)	NES		R. 3206. Establishing identity	3206	(4)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(i)(a)	No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(i)(a)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(i)(b)	No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(i)(b)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(ii)	No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(iii)	S. 13.2. Know your client	13.2	(5)	R. 3207. Identification exceptions	3207	(1)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(iv)	No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(iv)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(v)	S. 13.2. Know your client	13.2	(5)	R. 3207. Identification exceptions	3207	(1)(v)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(vi)	No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(vi)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(viii)	No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(1)(viii)	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(2)(i)	No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(2)(i)	Adopt existing IDPC Rule provision with withdrawal of reference to section 473(1) of the Cooperative Credit Associations Act (Canada).
No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(2)(ii)	No equivalent section (NES)	NES		R. 3207. Identification exceptions	3207	(2)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3208. Exemptions from Know-Your-Client	3208	(1)(i)	No equivalent section (NES)	NES		R. 3208. Exemptions from Know-Your-Client	3208	(1)(i)	Adopt existing IDPC Rule provision with additional reference to new DCR subsection 3209(5).
No equivalent section (NES)	NES		R. 3208. Exemptions from Know-Your-Client	3208	(1)(iii)	No equivalent section (NES)	NES		R. 3208. Exemptions from Know-Your-Client	3208	(1)(ii)	Adopt existing IDPC Rule provision with additional reference to new DCR subsection 3209(5).

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3208. Exemptions from Know-Your-Client	3208	(1)(iii)	No equivalent section (NES)	NES		R. 3208. Exemptions from Know-Your-Client	3208	(1)(iii)	Adopt existing IDPC Rule provision with additional reference to new DCR subsection 3209(5).
No equivalent section (NES)	NES		R. 3208. Exemptions from Know-Your-Client	3208	(1)(iv)	No equivalent section (NES)	NES		R. 3208. Exemptions from Know-Your-Client	3208	(1)(iv)	Adopt existing IDPC Rule provision with additional reference to new DCR subsection 3209(5).
R. 2.2.4 Updating Client Information	2.2.4	(b)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(1)	No equivalent section (NES)	NES		R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(1)	Adopt existing IDPC Rule provision.
R. 2.2.4 Updating Client Information	2.2.4	(c)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(2)	No equivalent section (NES)	NES		R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(2)	Adopt existing IDPC Rule provision.
R. 2.2.4 Updating Client Information	2.2.4	(b), (e)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(3)	S. 13.2. Know your client; S. 13.2.01. Know your client - trusted contact person	13.2; 13.2.01	(4); (2)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(3)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II.)(1.)-(3.)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(3)	S. 13.2. Know your client; S. 13.2.01. Know your client - trusted contact person	13.2; 13.2.01	(4); (2)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(3)	Adopt existing IDPC Rule provision.
R. 2.2.4 Updating Client Information	2.2.4	(f)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(4)	S. 13.2. Know your client	13.2	(4.1)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(4)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II.)(1.)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(4)	S. 13.2. Know your client	13.2	(4.1)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(4)	Adopt existing IDPC Rule provision.
R. 2.2.4 Updating Client Information	2.2.4	(f)(i)	No equivalent section (NES)	NES		S. 13.2. Know your client	14.2	(4.1)	R. 3209. Primary responsibility, delegation and obligation to keep current	3209	(5)	Adopt MFD Rule 2.2.4(f)(i) for mutual fund dealers only.
No equivalent section (NES)	NES		R. 3210. Definitions	3210	(1) "Client account records"	No equivalent section (NES)	NES		R. 3210. Definitions	3210	(1) "Client account records"	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(1)(i)	No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(1)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(1)(ii)	No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(1)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(2)(i)	No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(2)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(2)(ii)	No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(2)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(3)(i)	No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(3)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(3)(ii)	No equivalent section (NES)	NES		R. 3211. Account appropriateness	3211	(3)(ii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)(2.)	R. 3212. Account information	3212	(1)	No equivalent section (NES)	NES		R. 3212. Account information	3212	(1)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)(2.)	R. 3212. Account information	3212	(2)	No equivalent section (NES)	NES		R. 3212. Account information	3212	(2)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)(2.)	R. 3212. Account information	3212	(3)	No equivalent section (NES)	NES		R. 3212. Account information	3212	(3)	Adopt existing IDPC Rule provision.
R. 2.2.2 New Accounts	2.2.2	(c)(i)	R. 3212. Account information	3212	(4)(i)	No equivalent section (NES)	NES		R. 3212. Account information	3212	(4)(i)	Adopt existing IDPC Rule provision with a clear drafting modification.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.2.2 New Accounts	2.2.3	(c)(ii)(a)	R. 3212. Account information	3212	(4)(ii)(a)	No equivalent section (NES)		NES	R. 3212. Account information	3212	(4)(ii)(a)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 2.2.2 New Accounts	2.2.4	(c)(ii)(b)	R. 3212. Account information	3212	(4)(ii)(b)	No equivalent section (NES)		NES	R. 3212. Account information	3212	(4)(ii)(b)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 2.2.2 New Accounts	2.2.5	(c)(iii)	R. 3212. Account information	3212	(4)(iii)	No equivalent section (NES)		NES	R. 3212. Account information	3212	(4)(iii)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 2.2.2 New Accounts	2.2.6	(c)(iv)	R. 3212. Account information	3212	(4)(iv)	No equivalent section (NES)		NES	R. 3212. Account information	3212	(4)(iv)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)	R. 3213. Account opening policies and procedures	3213	(1)(i)	No equivalent section (NES)		NES	R. 3213. Account opening policies and procedures	3213	(1)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)	R. 3213. Account opening policies and procedures	3213	(1)(ii)	No equivalent section (NES)		NES	R. 3213. Account opening policies and procedures	3213	(1)(ii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)	R. 3213. Account opening policies and procedures	3213	(2)(i)	No equivalent section (NES)		NES	R. 3213. Account opening policies and procedures	3213	(2)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)	R. 3213. Account opening policies and procedures	3213	(2)(ii)	No equivalent section (NES)		NES	R. 3213. Account opening policies and procedures	3213	(2)(ii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)	R. 3213. Account opening policies and procedures	3213	(2)(iii)	No equivalent section (NES)		NES	R. 3213. Account opening policies and procedures	3213	(2)(iii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)	R. 3213. Account opening policies and procedures	3213	(2)(iv)	No equivalent section (NES)		NES	R. 3213. Account opening policies and procedures	3213	(2)(iv)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)	R. 3213. Account opening policies and procedures	3213	(2)(v)	No equivalent section (NES)		NES	R. 3213. Account opening policies and procedures	3213	(2)(v)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 2.2.2 New Accounts	2.2.2	(a)	R. 3214. Opening new client accounts	3214	(1)	No equivalent section (NES)		NES	R. 3214. Opening new client accounts	3214	(1)	Adopt existing IDPC Rule provision.
R. 2.2.3 New Account Approval	2.2.2		R. 3214. Opening new client accounts	3214	(2)	No equivalent section (NES)		NES	R. 3214. Opening new client accounts	3214	(2)	Adopt existing IDPC Rule provision with modification regarding Supervisor defined term.
R. 2.2.3 New Account Approval	2.2.2		R. 3214. Opening new client accounts	3214	(3)	No equivalent section (NES)		NES	R. 3214. Opening new client accounts	3214	(3)	Adopt existing IDPC Rule provision with modification regarding Supervisor defined term.
R. 2.2.3 New Account Approval	2.2.2		R. 3214. Opening new client accounts	3214	(4)	No equivalent section (NES)		NES	R. 3214. Opening new client accounts	3214	(4)	Adopt existing IDPC Rule provision with modification regarding Supervisor defined term.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)(10.)	R. 3214. Opening new client accounts	3214	(5)	No equivalent section (NES)		NES	R. 3214. Opening new client accounts	3214	(5)	Adopt existing IDPC Rule provision with modification regarding Supervisor and investment product defined terms.
No equivalent section (NES)	NES		R. 3214. Opening new client accounts	3214	(6)	No equivalent section (NES)		NES	R. 3214. Opening new client accounts	3214	(6)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
R. 2.2.4 Updating Client Information	2.2.4		R. 3215. Updating client accounts	3215	(1)	No equivalent section (NES)		NES	R. 3215. Updating client accounts	3215	(1)	Adopt existing IDPC Rule provision.
R. 2.2.4 Updating Client Information	2.2.4		R. 3215. Updating client accounts	3215	(2)(i)	No equivalent section (NES)		NES	R. 3215. Updating client accounts	3215	(2)(i)	Adopt existing IDPC Rule provision.
R. 2.2.4 Updating Client Information	2.2.4		R. 3215. Updating client accounts	3215	(2)(ii)	No equivalent section (NES)		NES	R. 3215. Updating client accounts	3215	(2)(ii)	Adopt existing IDPC Rule provision with modification regarding Supervisor defined term.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.2.4 Updating Client Information	2.2.4		R. 3215. Updating client accounts	3215	(3)	No equivalent section (NES)	NES		R. 3215. Updating client accounts	3215	(3)	Adopt existing IDPC Rule provision.
R. 2.2.4 Updating Client Information	2.2.4		R. 3215. Updating client accounts	3215	(4)	No equivalent section (NES)	NES		R. 3215. Updating client accounts	3215	(4)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
R. 2.2.4 Updating Client Information	2.2.4	(f)(i)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3215. Updating client accounts	3215	(5)	Adopt MFD Rule 2.2.4(f)(i) for mutual fund dealers only.
R. 200 Minimum Standards for Account Supervision	200	(II. Changes to KYC Information)(4.)	R. 3215. Updating client accounts	3215	(5)	No equivalent section (NES)	NES		R. 3215. Updating client accounts	3215	(6)	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(1)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(1)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 2.2.7 Relationship Disclosure	2.2.7	(2)	R. 3216. Relationship Disclosure	3216	(2)(i)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(2)(i)	Adopt existing IDPC Rule provision.
R. 2.2.7 Relationship Disclosure	2.2.7	(2)	R. 3216. Relationship Disclosure	3216	(2)(ii)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(2)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(3)(i)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(3)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(3)(ii)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(3)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(3)(iii)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(3)(iii)	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(4)(i)(a)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(4)(i)(a)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(4)(i)(b)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(4)(i)(b)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(4)(i)(c)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(4)(i)(c)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(4)(ii)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(4)(ii)	Adopt existing IDPC Rule provision.
R. 2.2.7 Relationship Disclosure	2.2.7		R. 3216. Relationship Disclosure	3216	(5)(i)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(i)	Adopt existing IDPC Rule provision.
R. 2.2.7 Relationship Disclosure	2.2.7	(i)(b)(i)	R. 3216. Relationship Disclosure	3216	(5)(ii)(a)(i)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(ii)(a)(i)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.2.7 Relationship Disclosure	2.2.7	(i)(b)(ii)	R. 3216. Relationship Disclosure	3216	(5)(ii)(a)(ii)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(ii)(a)(ii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.2.7 Relationship Disclosure	2.2.7	(i)(c)	R. 3216. Relationship Disclosure	3216	(5)(iii)(b)(i)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(iii)(b)(i)	Adopt existing IDPC Rule provision.
R. 2.2.7 Relationship Disclosure	2.2.7	(i)(c)	R. 3216. Relationship Disclosure	3216	(5)(iii)(b)(ii)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(iii)(b)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(5)(iii)(c)(i)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(iii)(c)(i)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.2.7 Relationship Disclosure	2.2.7		R. 3216. Relationship Disclosure	3216	(5)(ii)(m)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(ii)(m)	Adopt existing IDPC Rule provision.
R. 2.2.7 Relationship Disclosure	2.2.7		R. 3216. Relationship Disclosure	3216	(5)(ii)(n)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(ii)(n)	Adopt existing IDPC Rule provision.
R. 2.2.7 Relationship Disclosure	2.2.7		R. 3216. Relationship Disclosure	3216	(5)(ii)(o)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(ii)(o)	Adopt existing IDPC Rule provision.
R. 2.2.7 Relationship Disclosure	2.2.7		R. 3216. Relationship Disclosure	3216	(5)(iii)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(5)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3216. Relationship Disclosure	3216	(6)(i)	S. 14.2. Relationship disclosure information	14.2		R. 3216. Relationship Disclosure	3216	(6)(i)	Adopt existing IDPC Rule provision with modification regarding Supervisor defined term.
R. 2.6 Borrowing for Securities Purchase	2.6		R. 3217. Leverage risk disclosure statement	3217	(1)(i)	S. 13.13. Disclosure when recommending the use of borrowed money	13.13		R. 3217. Leverage risk disclosure statement	3217	(1)(i)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.6 Borrowing for Securities Purchase	2.6		R. 3217. Leverage risk disclosure statement	3217	(1)(ii)	S. 13.13. Disclosure when recommending the use of borrowed money	13.13		R. 3217. Leverage risk disclosure statement	3217	(1)(ii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.6 Borrowing for Securities Purchase	2.6		R. 3217. Leverage risk disclosure statement	3217	(2)	S. 13.13. Disclosure when recommending the use of borrowed money	13.13	(2)	R. 3217. Leverage risk disclosure statement	3217	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3217. Leverage risk disclosure statement	3217	(3)	S. 13.13. Disclosure when recommending the use of borrowed money	13.13		R. 3217. Leverage risk disclosure statement	3217	(3)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.4.4 Transaction Fees or Charges	2.4.4	(a)	R. 3218. Pre-trade disclosure of charges	3218	(1)(i)	S. 14.2.1. Pre-Trade disclosure of charges	14.2.1	(1)(a)	R. 3218. Pre-trade disclosure of charges	3218	(1)(i)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.4.4 Transaction Fees or Charges	2.4.4	(b)	R. 3218. Pre-trade disclosure of charges	3218	(1)(ii)	No equivalent section (NES)	NES		R. 3218. Pre-trade disclosure of charges	3218	(1)(ii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.4.4 Transaction Fees or Charges	2.4.4	(c)	R. 3218. Pre-trade disclosure of charges	3218	(1)(iii)	S. 14.2.1. Pre-Trade disclosure of charges	14.2.1	(1)(c)	R. 3218. Pre-trade disclosure of charges	3218	(1)(iii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.4.4 Transaction Fees or Charges	2.4.4	(d)	R. 3218. Pre-trade disclosure of charges	3218	(1)(iv)	S. 14.2.1. Pre-Trade disclosure of charges	14.2.1	(1)(d)	R. 3218. Pre-trade disclosure of charges	3218	(1)(iv)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3218. Pre-trade disclosure of charges	3218	(2)(i)	S. 14.2.1. Pre-Trade disclosure of charges	14.2.2	(3)	R. 3218. Pre-trade disclosure of charges	3218	(2)(i)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 200 Minimum Standards for Account Supervision	200	(II. Client Communications)	R. 3219. Client mail	3219	(1)(i)	No equivalent section (NES)	NES		R. 3219. Client mail	3219	(1)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Client Communications)	R. 3219. Client mail	3219	(1)(ii)	No equivalent section (NES)	NES		R. 3219. Client mail	3219	(1)(ii)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 200 Minimum Standards for Account Supervision	200	(II. Client Communications)	R. 3219. Client mail	3219	(1)(iii)	No equivalent section (NES)	NES		R. 3219. Client mail	3219	(1)(iii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Client Communications)	R. 3219. Client mail	3219	(2)(i)	No equivalent section (NES)	NES		R. 3219. Client mail	3219	(2)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Client Communications)	R. 3219. Client mail	3219	(2)(ii)	No equivalent section (NES)	NES		R. 3219. Client mail	3219	(2)(ii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Client Communications)	R. 3219. Client mail	3219	(2)(iii)	No equivalent section (NES)	NES		R. 3219. Client mail	3219	(2)(iii)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 200 Minimum Standards for Account Supervision	200	(II. Client Communications)	R. 3219. Client mail	3219	(3)(i)	No equivalent section (NES)	NES		R. 3219. Client mail	3219	(3)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Client Communications)	R. 3219. Client mail	3219	(3)(ii)	No equivalent section (NES)	NES		R. 3219. Client mail	3219	(3)(ii)	Adopt existing IDPC Rule provision.
R. 5.1 Requirements for Records	5.1		R. 3220. Record keeping	3220	(1)(i)	S. 11.5. General requirements for records	11.5		R. 3220. Record keeping	3220	(1)(i)	Adopt existing IDPC Rule provision.
R. 5.1 Requirements for Records	5.1		R. 3220. Record keeping	3220	(1)(ii)	S. 11.5. General requirements for records	11.5		R. 3220. Record keeping	3220	(1)(ii)	Adopt existing IDPC Rule provision.
R. 5.1 Requirements for Records	5.1	(h)	R. 3220. Record keeping	3220	(1)(iii)	S. 11.5. General requirements for records	11.5		R. 3220. Record keeping	3220	(1)(iii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)(2.)	R. 3220. Record keeping	3220	(2)	S. 11.5. General requirements for records	11.5		R. 3220. Record keeping	3220	(2)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(II. Documentation of Client Account Information)(2.)	R. 3220. Record keeping	3220	(3)	S. 11.5. General requirements for records	11.5		R. 3220. Record keeping	3220	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3220. Record keeping	3220	(4)	S. 11.5. General requirements for records	11.5		R. 3220. Record keeping	3220	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3221. Prohibition against discretionary trading	3221	(1)	No equivalent section (NES)	NES		R. 3221. Prohibition against discretionary trading	3221	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3221. Prohibition against discretionary trading	3221	(2)	No equivalent section (NES)	NES		R. 3221. Prohibition against discretionary trading	3221	(2)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.2.8 Conditions for Temporary Hold	2.2.8	(1)(a)	R. 3222. Conditions for temporary holds	3222	(1)(i)	S. 13.19. Conditions for temporary hold	13.19	(1)(a)	R. 3222. Conditions for temporary holds	3222	(1)(i)	Adopt existing IDPC Rule provision.
R. 2.2.8 Conditions for Temporary Hold	2.2.8	(1)(b)	R. 3222. Conditions for temporary holds	3222	(1)(ii)	S. 13.19. Conditions for temporary hold	13.19	(1)(b)	R. 3222. Conditions for temporary holds	3222	(1)(ii)	Adopt existing IDPC Rule provision.
R. 2.2.8 Conditions for Temporary Hold	2.2.8	(2)	R. 3222. Conditions for temporary holds	3222	(2)	S. 13.19. Conditions for temporary hold	13.19	(2)	R. 3222. Conditions for temporary holds	3222	(2)	Adopt existing IDPC Rule provision.
R. 2.2.8 Conditions for Temporary Hold	2.2.8	(3)(a)	R. 3222. Conditions for temporary holds	3222	(3)(i)	S. 13.19. Conditions for temporary hold	13.19	(3)(a)	R. 3222. Conditions for temporary holds	3222	(3)(i)	Adopt existing IDPC Rule provision.
R. 2.2.8 Conditions for Temporary Hold	2.2.8	(3)(b)	R. 3222. Conditions for temporary holds	3222	(3)(ii)	S. 13.19. Conditions for temporary hold	13.19	(3)(b)	R. 3222. Conditions for temporary holds	3222	(3)(ii)	Adopt existing IDPC Rule provision.
R. 2.2.8 Conditions for Temporary Hold	2.2.8	(3)(c)	R. 3222. Conditions for temporary holds	3222	(3)(iii)	S. 13.19. Conditions for temporary hold	13.19	(3)(c)	R. 3222. Conditions for temporary holds	3222	(3)(iii)	Adopt existing IDPC Rule provision.
R. 2.2.8 Conditions for Temporary Hold	2.2.8	(3)(d)(i)	R. 3222. Conditions for temporary holds	3222	(3)(iv)(a)	S. 13.19. Conditions for temporary hold	13.19	(3)(d)(i)	R. 3222. Conditions for temporary holds	3222	(3)(iv)(a)	Adopt existing IDPC Rule provision.
R. 2.2.8 Conditions for Temporary Hold	2.2.8	(3)(d)(ii)	R. 3222. Conditions for temporary holds	3222	(3)(iv)(b)	S. 13.19. Conditions for temporary hold	13.19	(3)(d)(ii)	R. 3222. Conditions for temporary holds	3222	(3)(iv)(b)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3223. - 3229. Reserved.	3223 - 3229		No equivalent section (NES)	NES		R. 3223. - 3229. Reserved.	3223 - 3229		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3230. Rules applicable to advisory accounts	3230	(1)	No equivalent section (NES)	NES		R. 3230. Rules applicable to advisory accounts	3230	(1)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3245. Rules applicable to margin accounts	3245	(1)	No equivalent section (NES)	NES		R. 3245. Rules applicable to margin accounts	3245	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3245. Rules applicable to margin accounts	3245	(2)(i)	No equivalent section (NES)	NES		R. 3245. Rules applicable to margin accounts	3245	(2)(i)	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3245. Rules applicable to margin accounts	3245	(2)(ii)	No equivalent section (NES)	NES		R. 3245. Rules applicable to margin accounts	3245	(2)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3246. Margin requirements - when to extend margin to clients	3246	(1)	No equivalent section (NES)	NES		R. 3246. Margin requirements - when to extend margin to clients	3246	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(1)(i)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(1)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(1)(ii)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(1)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(i)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(ii)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(iii)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(iv)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(iv)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(v)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(v)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(vi)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(vi)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(vii)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(vii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(viii)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(viii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(ix)	No equivalent section (NES)	NES		R. 3247. Margin account agreement	3247	(2)(ix)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3248. - 3249. Reserved.	3248 - 3249		No equivalent section (NES)	NES		R. 3248. - 3249. Reserved.	3248 - 3249		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3250. Rules applicable to derivatives trading accounts	3250	(1)	No equivalent section (NES)	NES		R. 3250. Rules applicable to derivatives trading accounts	3250	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3250. Rules applicable to derivatives trading accounts	3250	(2)(i)	No equivalent section (NES)	NES		R. 3250. Rules applicable to derivatives trading accounts	3250	(2)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and with a clear drafting modification.
No equivalent section (NES)	NES		R. 3250. Rules applicable to derivatives trading accounts	3250	(2)(ii)	No equivalent section (NES)	NES		R. 3250. Rules applicable to derivatives trading accounts	3250	(2)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3250. Rules applicable to derivatives trading accounts	3250	(3)	No equivalent section (NES)	NES		R. 3250. Rules applicable to derivatives trading accounts	3250	(3)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3253. Letter of undertaking	3253	(2)(ii)	No equivalent section (NES)	NES		R. 3253. Letter of undertaking	3253	(2)(ii)	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(i)	No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(ii)	No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(iii)	No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(iv)	No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(iv)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(v)	No equivalent section (NES)	NES		R. 3254. Derivatives risk disclosure statement	3254	(1)(v)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3255. Position and exercise limits	3255	(1)	No equivalent section (NES)	NES		R. 3255. Position and exercise limits	3255	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3256. Futures porting disclosures	3256	(1)(i)	No equivalent section (NES)	NES		R. 3256. Futures porting disclosures	3256	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3256. Futures porting disclosures	3256	(1)(ii)	No equivalent section (NES)	NES		R. 3256. Futures porting disclosures	3256	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3256. Futures porting disclosures	3256	(1)(iii)	No equivalent section (NES)	NES		R. 3256. Futures porting disclosures	3256	(1)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3257. - 3269. Reserved.	3257 - 3269		No equivalent section (NES)	NES		R. 3257. - 3269. Reserved.	3257 - 3269		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3270. Definitions	3270	(1) "responsible person"	No equivalent section (NES)	NES		R. 3270. Definitions	3270	(1) "responsible person"	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3271. Rules applicable to discretionary accounts and managed accounts	3271	(1)	No equivalent section (NES)	NES		R. 3271. Rules applicable to discretionary accounts and managed accounts	3271	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3271. Rules applicable to discretionary accounts and managed accounts	3271	(2)(i)	No equivalent section (NES)	NES		R. 3271. Rules applicable to discretionary accounts and managed accounts	3271	(2)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification.
No equivalent section (NES)	NES		R. 3271. Rules applicable to discretionary accounts and managed accounts	3271	(2)(ii)	No equivalent section (NES)	NES		R. 3271. Rules applicable to discretionary accounts and managed accounts	3271	(2)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3271. Rules applicable to discretionary accounts and managed accounts	3271	(3)	No equivalent section (NES)	NES		R. 3271. Rules applicable to discretionary accounts and managed accounts	3271	(3)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3272. Reserved.	3272		No equivalent section (NES)	NES		R. 3272. Reserved.	3272		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(i)	No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(i)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(ii)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(iii)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule provision in order to clarify drafting.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(iv)	No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(ii)(a)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(ii)(b)	Adopt restructured provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(v)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3273. Accepting a discretionary account	3273	(1)(vi)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(i)	No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(ii)	No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(iii)	No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(iv)	No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(iv)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(v)	No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(1)(v)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(2)(i)	No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(2)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(2)(ii)	No equivalent section (NES)	NES		R. 3274. Discretionary account agreement	3274	(2)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3275. Persons authorized to affect discretionary trades	3275	(1)(i)	No equivalent section (NES)	NES		R. 3275. Persons authorized to affect discretionary trades	3275	(1)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3275. Persons authorized to affect discretionary trades	3275	(1)(ii)	No equivalent section (NES)	NES		R. 3275. Persons authorized to affect discretionary trades	3275	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(1)	No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(2)	No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(3)(i)	No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(3)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(3)(ii)	No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(3)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(4)	No equivalent section (NES)	NES		R. 3276. Conflicts of interest	3276	(4)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(i)	No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(i)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(ii)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule provision in order to clarify drafting.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(iii)	No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(i)(a)-(b)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(iv)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(v)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(vi)	No equivalent section (NES)	NES		R. 3277. Opening a managed account	3277	(1)(iii)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(1)(i)	No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(1)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(1)(ii)	No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(1)(iii)	No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(1)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(2)(i)	No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(2)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(2)(ii)	No equivalent section (NES)	NES		R. 3278. Managed account agreement	3278	(2)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(1)(i)	No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(1)(ii)	No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(1)(iii)	No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(1)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(2)(i)	No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(2)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(2)(ii)	No equivalent section (NES)	NES		R. 3279. Persons authorized to deal with managed accounts	3279	(2)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3280. Conflicts of interest	3280	(1)	S. 13.5. Restrictions on certain managed account transactions	13.5		R. 3280. Conflicts of interest	3280	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3280. Conflicts of interest	3280	(2)(i)	S. 13.5. Restrictions on certain managed account transactions	13.5		R. 3280. Conflicts of interest	3280	(2)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3280. Conflicts of interest	3280	(2)(ii)	S. 13.5. Restrictions on certain managed account transactions	13.5		R. 3280. Conflicts of interest	3280	(2)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3280. Conflicts of interest	3280	(2)(iii)	S. 13.5. Restrictions on certain managed account transactions	13.5		R. 3280. Conflicts of interest	3280	(2)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3280. Conflicts of interest	3280	(3)(i)	S. 13.5. Restrictions on certain managed account transactions	13.5		R. 3280. Conflicts of interest	3280	(3)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3280. Conflicts of interest	3280	(3)(ii)	S. 13.5. Restrictions on certain managed account transactions	13.5		R. 3280. Conflicts of interest	3280	(3)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3280. Conflicts of interest	3280	(3)(iii)	S. 13.5. Restrictions on certain managed account transactions	13.5		R. 3280. Conflicts of interest	3280	(3)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3280. Conflicts of interest	3280	(4)	S. 14.10. Allocating investment opportunities fairly	14.1		R. 3280. Conflicts of interest	3280	(4)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3281. Fees and remuneration	3281	(1)(i)	No equivalent section (NES)	NES		R. 3281. Fees and remuneration	3281	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification.
No equivalent section (NES)	NES		R. 3281. Fees and remuneration	3281	(1)(ii)	No equivalent section (NES)	NES		R. 3281. Fees and remuneration	3281	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification.
No equivalent section (NES)	NES		R. 3281. Fees and remuneration	3281	(2)	No equivalent section (NES)	NES		R. 3281. Fees and remuneration	3281	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification.
No equivalent section (NES)	NES		R. 3282. - 3299. Reserved.	3282 - 3299		No equivalent section (NES)	NES		R. 3282. - 3299. Reserved.	3282 - 3299		Adopt existing IDPC Rule provision.
R. 2.2.5 Know Your Product	2.2.5	(1)(a)	R. 3301. Product Due Diligence	3301	(1)(i)	S. 13.2.1. Know your product	13.2.1	(1)(a)	R. 3301. Product Due Diligence	3301	(1)(i)	Adopt existing IDPC Rule provision with addition of investment products defined term and a clear drafting modification.
R. 2.2.5 Know Your Product	2.2.5	(1)(b)	R. 3301. Product Due Diligence	3301	(1)(ii)	S. 13.2.1. Know your product	13.2.1	(1)(b)	R. 3301. Product Due Diligence	3301	(1)(ii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.2.5 Know Your Product	2.2.5	(1)(c)	R. 3301. Product Due Diligence	3301	(1)(iii)	S. 13.2.1. Know your product	13.2.1	(1)(c)	R. 3301. Product Due Diligence	3301	(1)(iii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.2.5 Know Your Product	2.2.5	(3)	R. 3301. Product Due Diligence	3301	(2)	S. 13.2.1. Know your product	13.2.1	(3)	R. 3301. Product Due Diligence	3301	(2)	Adopt existing IDPC Rule provision with addition of investment products defined term and a clear drafting modification.
R. 2.2.5 Know Your Product	2.2.5	(2)	R. 3302. Know-Your-Product	3302	(1)	S. 13.2.1. Know your product	13.2.1	(2)	R. 3302. Know-Your-Product	3302	(1)	Adopt existing IDPC Rule provision with addition of investment products defined term and a clear drafting modification.
R. 2.2.5 Know Your Product	2.2.5	(2.1)	R. 3302. Know-Your-Product	3302	(2)	S. 13.2.1. Know your product	13.2.1	(2.1)	R. 3302. Know-Your-Product	3302	(2)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3303. Exemptions from Product Due Diligence and Know-Your-Product	3303	(1)	No equivalent section (NES)	NES		R. 3303. Exemptions from Product Due Diligence and Know-Your-Product	3303	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3303. Exemptions from Product Due Diligence and Know-Your-Product	3303	(2)(i)	No equivalent section (NES)	NES		R. 3303. Exemptions from Product Due Diligence and Know-Your-Product	3303	(2)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3303. Exemptions from Product Due Diligence and Know-Your-Product	3303	(2)(ii)	No equivalent section (NES)	NES		R. 3303. Exemptions from Product Due Diligence and Know-Your-Product	3303	(2)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3303. Exemptions from Product Due Diligence and Know-Your-Product	3303	(2)(iii)	No equivalent section (NES)	NES		R. 3303. Exemptions from Product Due Diligence and Know-Your-Product	3303	(2)(iii)	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3304. - 3399. Reserved.	3304 - 3399		No equivalent section (NES)	NES		R. 3304. - 3399. Reserved.	3304 - 3399		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3401. Introduction	3401	(1)	No equivalent section (NES)	NES		R. 3401. Introduction	3401	(1)	Adopt existing IDPC Rule provision.
R. 2.2.6 Suitability Determination	2.2.6	(1)(a)(i)	R. 3402. Retail client suitability determination requirements	3402	(1)(i)(a)	S. 13.3. Suitability	13.3	(1)(i)(i)	R. 3402. Retail client suitability determination requirements	3402	(1)(i)-(iv)(a)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting with addition of investment products defined term.
R. 2.2.6 Suitability Determination	2.2.6	(1)(a)(ii)	R. 3402. Retail client suitability determination requirements	3402	(1)(i)(b)	S. 13.3. Suitability	13.3	(1)(a)(ii)	R. 3402. Retail client suitability determination requirements	3402	(1)(iv)(b)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting with addition of investment products defined term.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.2.6 Suitability Determination	2.2.6	(1)(a)(iii)	R. 3402. Retail client suitability determination requirements	3402	(1)(i)(c)	S. 13.3. Suitability	13.3	(1)(a)(iii)	R. 3402. Retail client suitability determination requirements	3402	(1)(iv)(c)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting with addition of investment products defined term.
R. 2.2.6 Suitability Determination	2.2.6	(1)(a)(iv)	R. 3402. Retail client suitability determination requirements	3402	(1)(i)(d)	S. 13.3. Suitability	13.3	(1)(a)(iv)	R. 3402. Retail client suitability determination requirements	3402	(1)(iv)(d)	Adopt existing IDPC Rule provision.
R. 2.2.6 Suitability Determination	2.2.6	(1)(a)(v)	R. 3402. Retail client suitability determination requirements	3402	(1)(i)(e)	S. 13.3. Suitability	13.3	(1)(a)(v)	R. 3402. Retail client suitability determination requirements	3402	(1)(iv)(e)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 2.2.6 Suitability Determination	2.2.6	(1)(b)	R. 3402. Retail client suitability determination requirements	3402	(1)(ii)	S. 13.3. Suitability	13.3	(1)(b)	R. 3402. Retail client suitability determination requirements	3402	(1)(v)	Adopt existing IDPC Rule provision.
R. 2.2.6 Suitability Determination	2.2.6	(2)(e)	R. 3402. Retail client suitability determination requirements	3402	(2)(i)	No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(2)(i)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(2)(ii)	S. 13.3. Suitability	13.3	(2)(a)	R. 3402. Retail client suitability determination requirements	3402	(2)(ii)	Adopt existing IDPC Rule provision with addition of investment products defined term and a clear drafting modification.
R. 2.2.6 Suitability Determination	2.2.6	(2)(c)	R. 3402. Retail client suitability determination requirements	3402	(2)(iii)	S. 13.3. Suitability	13.3	(2)(c)	R. 3402. Retail client suitability determination requirements	3402	(2)(iii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.2.6 Suitability Determination	2.2.6	(2)(b)	R. 3402. Retail client suitability determination requirements	3402	(2)(iv)	S. 13.3. Suitability	13.3	(2)(b)	R. 3402. Retail client suitability determination requirements	3402	(2)(iv)	Adopt existing IDPC Rule provision with addition of investment products defined term.
R. 2.2.6 Suitability Determination	2.2.6	(2)(d)	R. 3402. Retail client suitability determination requirements	3402	(2)(v)	S. 13.3. Suitability	13.3	(2)(d)	R. 3402. Retail client suitability determination requirements	3402	(2)(v)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(3)(i)	No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(8)(i)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(3)(ii)	No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(8)(ii)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(4)	No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(3)	Adopt restructured version of IDPC Rule provision in order to clarify drafting.
R. 2.2.6 Suitability Determination	2.2.6	(2.2)(a)	R. 3402. Retail client suitability determination requirements	3402	(5)(i)	S. 13.3. Suitability	13.3	(2.1)(a)	R. 3402. Retail client suitability determination requirements	3402	(4)(i)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
R. 2.2.6 Suitability Determination	2.2.6	(2.2)(b)	R. 3402. Retail client suitability determination requirements	3402	(5)(ii)	S. 13.3. Suitability	13.3	(2.1)(b)	R. 3402. Retail client suitability determination requirements	3402	(4)(ii)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
R. 2.2.6 Suitability Determination	2.2.6	(2.2)(c)	R. 3402. Retail client suitability determination requirements	3402	(5)(iii)	S. 13.3. Suitability	13.3	(2.1)(c)	R. 3402. Retail client suitability determination requirements	3402	(4)(iii)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
R. 2.2.6 Suitability Determination	2.2.6	(2.1)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(5)(i)	Adopt a modified version of the MFD Rule provision requiring certain steps after an unsuitability determination.
R. 2.2.6 Suitability Determination	2.2.6	(2.1)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(5)(ii)	Adopt a modified version of the MFD Rule provision requiring certain steps after an unsuitability determination.
R. 2.2.6 Suitability Determination	2.2.6	(2.1)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(5)(iii)	Adopt a modified version of the MFD Rule provision requiring certain steps after an unsuitability determination.
R. 200 Minimum Standards for Account Supervision	200	(III.)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(6)	Adopt a modified version of the MFD Rule provision requiring policies and procedures regarding the suitability of leverage strategies.
R. 200 Minimum Standards for Account Supervision	200	(III.)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3402. Retail client suitability determination requirements	3402	(7)	Adopt a modified version of the MFD Rule provision requiring policies and procedures regarding the suitability of leverage strategies.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3404. Exemptions from the suitability	3404	(4)	S. 13.3. Suitability	13.3	(3)	R. 3404. Exemptions from the suitability	3404	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3405. Reserved.	3405		No equivalent section (NES)	NES		R. 3405. Reserved.	3405		Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	Introduction (c)	R. 3406. Primary responsibility and delegation	3406	(1)	No equivalent section (NES)	NES		R. 3406. Primary responsibility and delegation	3406	(1)	Adopt existing IDPC Rule provision.
R. 2.5.8 No Delegation	2.5.8		R. 3406. Primary responsibility and delegation	3406	(2)	No equivalent section (NES)	NES		R. 3406. Primary responsibility and delegation	3406	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3407 - 3499. Reserved.	3407 - 3499		No equivalent section (NES)	NES		R. 3407 - 3499. Reserved.	3407 - 3499		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3501. Introduction	3501	(1)	No equivalent section (NES)	NES		R. 3501. Introduction	3501	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3502. Definitions	3502	(1) "commencement of distribution"	No equivalent section (NES)	NES		R. 3502. Definitions	3502	(1) "commencement of distribution"	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification.
No equivalent section (NES)	NES		R. 3502. Definitions	3502	(1) "distribution"	No equivalent section (NES)	NES		R. 3502. Definitions	3502	(1) "distribution"	Adopt existing IDPC Rule provision with a clear drafting modification.
No equivalent section (NES)	NES		R. 3502. Definitions	3502	(1) "distribution discussions"	No equivalent section (NES)	NES		R. 3502. Definitions	3502	(1) "distribution discussions"	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification.
No equivalent section (NES)	NES		R. 3503. Client priority	3503	(1)	No equivalent section (NES)	NES		R. 3503. Client priority	3503	(1)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3503. Client priority	3503	(2)	No equivalent section (NES)	NES		R. 3503. Client priority	3503	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3503. Client priority	3503	(3)	No equivalent section (NES)	NES		R. 3503. Client priority	3503	(3)	Adopt existing IDPC Rule provision.
R. 2.4.3 Operating Charges	2.4.3		R. 3504. Commission fees, service fees and other account related fees	3504	(1)(i)	No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(1)(i)	Adopt existing IDPC Rule provision.
R. 2.4.3 Operating Charges	2.4.3		R. 3504. Commission fees, service fees and other account related fees	3504	(1)(ii)	No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(1)(ii)	Adopt existing IDPC Rule provision.
R. 2.4.3 Operating Charges	2.4.3		R. 3504. Commission fees, service fees and other account related fees	3504	(1)(iii)	No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(1)(iii)	Adopt existing IDPC Rule provision.
R. 2.4.3 Operating Charges	2.4.3		R. 3504. Commission fees, service fees and other account related fees	3504	(1)(iv)	No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(1)(iv)	Adopt existing IDPC Rule provision.
R. 2.4.3 Operating Charges	2.4.3		R. 3504. Commission fees, service fees and other account related fees	3504	(2)	No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(3)	Adopt new provision regarding required disclosure to clients regarding interest that will be paid on client cash held in trust.
No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(3)	No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(4)	No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(5)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(5)	No equivalent section (NES)	NES		R. 3504. Commission fees, service fees and other account related fees	3504	(6)	Adopt existing IDPC Rule provision.
R. 2.4.1	2.4.1	(a) Payable by Member Only	R. 3505. Payment of commission fees	3505	(1)	No equivalent section (NES)	NES		R. 3505. Payment of commission fees	3505	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3506. During the period of distribution	3506	(1)	No equivalent section (NES)	NES		R. 3506. During the period of distribution	3506	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3506. During the period of distribution	3506	(2)	No equivalent section (NES)	NES		R. 3506. During the period of distribution	3506	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3507. New issues	3507	(1)	No equivalent section (NES)	NES		R. 3507. New issues	3507	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3507. New issues	3507	(2)	No equivalent section (NES)	NES		R. 3507. New issues	3507	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3507. New issues	3507	(3)(i)	No equivalent section (NES)	NES		R. 3507. New issues	3507	(3)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3507. New issues	3507	(3)(ii)	No equivalent section (NES)	NES		R. 3507. New issues	3507	(3)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3508. Inside information	3508	(1)	No equivalent section (NES)	NES		R. 3508. Inside information	3508	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3508. Inside information	3508	(2)	No equivalent section (NES)	NES		R. 3508. Inside information	3508	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3508. Inside information	3508	(3)	No equivalent section (NES)	NES		R. 3508. Inside information	3508	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3508. Inside information	3508	(4)	No equivalent section (NES)	NES		R. 3508. Inside information	3508	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3508. Inside information	3508	(5)	No equivalent section (NES)	NES		R. 3508. Inside information	3508	(5)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(1)(i)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(1)(ii)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(2)(i)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(2)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(2)(ii)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(2)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(2)(iii)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(2)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(3)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(4)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(4)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(5)(i)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(5)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(5)(ii)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(5)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(6)(i)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(6)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(6)(ii)	No equivalent section (NES)	NES		R. 3509. Premarketing	3509	(6)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3510 - 3599. Reserved.	3510 - 3599		No equivalent section (NES)	NES		R. 3510 - 3599. Reserved.	3510 - 3599		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3601. Introduction	3601	(1)	No equivalent section (NES)	NES		R. 3601. Introduction	3601	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3601. Introduction	3601	(2) Part A	No equivalent section (NES)	NES		R. 3601. Introduction	3601	(2) Part A	Adopt existing IDPC Rule provision with modified drafting in order to replace sales literature and correspondence with the terms sales communications and client communications.
No equivalent section (NES)	NES		R. 3601. Introduction	3601	(2) Part B	No equivalent section (NES)	NES		R. 3601. Introduction	3601	(2) Part B	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3601. Introduction	3601	(2) Part C	No equivalent section (NES)	NES		R. 3601. Introduction	3601	(2) Part C	Adopt existing IDPC Rule provision.
R. 2.7.2 General Restrictions	2.7.2	(a)	R. 3602. Advertising	3602	(1)(i)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(1)(i)	Adopt existing IDPC Rule provision with modified drafting in order to replace sales literature and correspondence with the terms sales communications and client communications.
R. 2.8.2 General Restrictions	2.8.2	(a)	R. 3602. Advertising	3602	(1)(i)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(1)(i)	Adopt existing IDPC Rule provision with modified drafting in order to replace sales literature and correspondence with the terms sales communications and client communications.
R. 2.8.2 General Restrictions	2.8.2	(a)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3602. Advertising	3603	(1)(ii)	Adopt MFD Rule provision regarding prohibition regarding images that convey misleading impressions.
R. 2.7.2 General Restrictions	2.7.2	(a)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3602. Advertising	3603	(1)(ii)	Adopt MFD Rule provision regarding prohibition regarding images that convey misleading impressions.
R. 2.7.2 General Restrictions	2.7.2	(b)	R. 3602. Advertising	3602	(1)(ii)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(1)(iii)	Adopt existing IDPC Rule provision.
R. 2.7.2 General Restrictions	2.7.2	(c)	R. 3602. Advertising	3602	(1)(iii)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(1)(iv)	Adopt existing IDPC Rule provision.
R. 2.8.2 General Restrictions	2.8.2	(b)	R. 3602. Advertising	3602	(1)(iii)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(1)(iv)	Adopt existing IDPC Rule provision.
R. 2.7.2 General Restrictions	2.7.2	(d)	R. 3602. Advertising	3602	(1)(iv)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(1)(v)	Adopt existing IDPC Rule provision.
R. 2.7.2 General Restrictions	2.7.2	(e)	R. 3602. Advertising	3602	(1)(v)	No equivalent section (NES)	NES		R. 3602. Advertising	3603	(1)(vi)	Adopt existing IDPC Rule provision.
R. 2.7.2 General Restrictions	2.7.2	(f)	R. 3602. Advertising	3602	(1)(vi)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(1)(vii)	Adopt existing IDPC Rule provision.
R. 2.8.2 General Restrictions	2.8.2	(c)	R. 3602. Advertising	3602	(1)(vi)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(1)(vii)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.7.2 General Restrictions	2.7.2	(g)	R. 3602. Advertising	3602	(1)(vii)	No equivalent section (NES)	NES		R. 3602. Advertising	3603	(1)(viii)	Adopt existing IDPC Rule provision.
R. 2.8.2 General Restrictions	2.8.2	(d)	R. 3602. Advertising	3602	(1)(vii)	No equivalent section (NES)	NES		R. 3602. Advertising	3604	(1)(viii)	Adopt existing IDPC Rule provision.
R. 2.7.3 Review Requirements	2.7.3		R. 3602. Advertising	3602	(2)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(2)	Adopt existing IDPC Rule provision with modified drafting in order to replace sales literature and correspondence with the terms sales communications and client communications.
R. 500 Branch Review Requirements	500	(e)	R. 3602. Advertising	3602	(2)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(2)	Adopt existing IDPC Rule provision with modified drafting in order to replace sales literature and correspondence with the terms sales communications and client communications.
R. 2.7.3 Review Requirements	2.7.3		R. 3602. Advertising	3602	(3)(i)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(3)(i)	Adopt existing IDPC Rule provision.
R. 2.7.3 Review Requirements	2.7.3		R. 3602. Advertising	3602	(3)(ii)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(3)(ii)	Adopt existing IDPC Rule provision.
R. 2.7.3 Review Requirements	2.7.3		R. 3602. Advertising	3602	(3)(iii)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(3)(iii)	Adopt existing IDPC Rule provision.
R. 2.7.3 Review Requirements	2.7.3		R. 3602. Advertising	3602	(3)(iv)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(3)(iv)	Adopt existing IDPC Rule provision.
R. 2.7.3 Review Requirements	2.7.3		R. 3602. Advertising	3602	(3)(v)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(3)(v)	Adopt existing IDPC Rule provision.
R. 2.7.3 Review Requirements	2.7.3		R. 3602. Advertising	3602	(3)(vi)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(3)(vi)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3602. Advertising	3602	(4)(i)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(4)(i)	Adopt existing IDPC Rule provision with modified drafting in order to replace advertising, sales literature and correspondence with the terms advertisements, sales communications and client communications.
No equivalent section (NES)	NES		R. 3602. Advertising	3602	(4)(ii)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(4)(ii)	Adopt existing IDPC Rule provision with modified drafting in order to replace advertising, sales literature and correspondence with the terms advertisements, sales communications and client communications.
No equivalent section (NES)	NES		R. 3602. Advertising	3602	(4)(iii)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(4)(iii)	Adopt existing IDPC Rule provision with modified drafting in order to replace advertising, sales literature and correspondence with the terms advertisements, sales communications and client communications.
No equivalent section (NES)	NES		R. 3602. Advertising	3602	(5)(i)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(5)(i)	Adopt existing IDPC Rule provision with modified drafting in order to replace sales literature and correspondence with the terms sales communications and client communications.
No equivalent section (NES)	NES		R. 3602. Advertising	3602	(5)(ii)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(5)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3602. Advertising	3602	(6)	No equivalent section (NES)	NES		R. 3602. Advertising	3602	(6)	Adopt existing IDPC Rule provision with modified drafting in order to replace sales literature and correspondence with the terms sales communications and client communications.
No equivalent section (NES)	NES		R. 3603 - 3605. Reserved.	3603 - 3605		No equivalent section (NES)	NES		R. 3603 - 3605. Reserved.	3603 - 3605		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3606. Definitions	3606	(1) "analyst"	No equivalent section (NES)	NES		R. 3606. Definitions	3606	(1) "analyst"	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3606. Definitions	3606	(1) "equity related security"	No equivalent section (NES)	NES		R. 3606. Definitions	3606	(1) "equity related security"	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3606. Definitions	3606	(1) "investment banking" or "investment banking service"	No equivalent section (NES)	NES		R. 3606. Definitions	3606	(1) "investment banking" or "investment banking service"	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3611. Independent third party research report	3611	(2)(i)	No equivalent section (NES)	NES		R. 3611. Independent third party research report	3611	(2)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3611. Independent third party research report	3611	(2)(ii)	No equivalent section (NES)	NES		R. 3611. Independent third party research report	3611	(2)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3611. Independent third party research report	3611	(2)(iii)	No equivalent section (NES)	NES		R. 3611. Independent third party research report	3611	(2)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3612. Directing the reader to disclosures	3612	(1)(i)	No equivalent section (NES)	NES		R. 3612. Directing the reader to disclosures	3612	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3612. Directing the reader to disclosures	3612	(1)(ii)	No equivalent section (NES)	NES		R. 3612. Directing the reader to disclosures	3612	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3613. Visiting an issuer	3613	(1)(i)	No equivalent section (NES)	NES		R. 3613. Visiting an issuer	3613	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3613. Visiting an issuer	3613	(1)(ii)	No equivalent section (NES)	NES		R. 3613. Visiting an issuer	3613	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3614. Relationship with the issuer	3614	(1)(i)	No equivalent section (NES)	NES		R. 3614. Relationship with the issuer	3614	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3614. Relationship with the issuer	3614	(1)(ii)	No equivalent section (NES)	NES		R. 3614. Relationship with the issuer	3614	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3615. Notice to discontinue coverage	3615	(1)	No equivalent section (NES)	NES		R. 3615. Notice to discontinue coverage	3615	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3615. Notice to discontinue coverage	3615	(2)	No equivalent section (NES)	NES		R. 3615. Notice to discontinue coverage	3615	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3616. Setting price targets	3616	(1)	No equivalent section (NES)	NES		R. 3616. Setting price targets	3616	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3617. Prohibited inducements	3617	(1)(i)	No equivalent section (NES)	NES		R. 3617. Prohibited inducements	3617	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3617. Prohibited inducements	3617	(1)(ii)	No equivalent section (NES)	NES		R. 3617. Prohibited inducements	3617	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3617. Prohibited inducements	3617	(1)(iii)	No equivalent section (NES)	NES		R. 3617. Prohibited inducements	3617	(1)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3617. Prohibited inducements	3617	(1)(iv)	No equivalent section (NES)	NES		R. 3617. Prohibited inducements	3617	(1)(iv)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3618. Public comments	3618	(1)	No equivalent section (NES)	NES		R. 3618. Public comments	3618	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(1)(i)	No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification..
No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(1)(ii)	No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification..
No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(1)(iii)	No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(1)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and a clear drafting modification..

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(2)	No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(3)	No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(3)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(4)	No equivalent section (NES)	NES		R. 3619. Policies and procedures on trading	3619	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3620. Prohibition on investment banking compensation	3620	(1)	No equivalent section (NES)	NES		R. 3620. Prohibition on investment banking compensation	3620	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3620. Prohibition on investment banking compensation	3620	(2)	No equivalent section (NES)	NES		R. 3620. Prohibition on investment banking compensation	3620	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(1)	No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(2)(i)	No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(2)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(2)(ii)	No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(2)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(2)(iii)	No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(2)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(2)(iv)	No equivalent section (NES)	NES		R. 3621. Relationship with investment banking	3621	(2)(iv)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3622. Quiet periods	3622	(1)(i)	No equivalent section (NES)	NES		R. 3622. Quiet periods	3622	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3622. Quiet periods	3622	(1)(ii)	No equivalent section (NES)	NES		R. 3622. Quiet periods	3622	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3622. Quiet periods	3622	(2)	No equivalent section (NES)	NES		R. 3622. Quiet periods	3622	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3622. Quiet periods	3622	(3)	No equivalent section (NES)	NES		R. 3622. Quiet periods	3622	(3)	Adopt existing IDPC Rule provision.
R. 1.3.2 Requirements for Outside Activity	1.3.2	(c)	R. 3623. Outside activities	3623	(1)	No equivalent section (NES)	NES		R. 3623. Outside activities	3623	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3624. - 3639. Reserved.	3624 - 3639		No equivalent section (NES)	NES		R. 3624. - 3639. Reserved.	3624 - 3639		Adopt existing IDPC Rule provision.
R. 1.2.5 Misleading Communications	1.2.5	(1)(a)	R. 3640. Misleading communications	3640	(1)(i)	S. 13.8. Misleading communications	13.18	(1)(a)	R. 3640. Misleading communications	3640	(1)(i)	Adopt existing IDPC Rule provision.
R. 1.2.5 Misleading Communications	1.2.5	(1)(b)	R. 3640. Misleading communications	3640	(1)(ii)	S. 13.8. Misleading communications	13.18	(1)(b)	R. 3640. Misleading communications	3640	(1)(ii)	Adopt existing IDPC Rule provision.
R. 1.2.5 Misleading Communications	1.2.5	(1)(c)	R. 3640. Misleading communications	3640	(1)(iii)	S. 13.8. Misleading communications	13.18	(1)(c)	R. 3640. Misleading communications	3640	(1)(iii)	Adopt existing IDPC Rule provision.
R. 1.2.5 Misleading Communications	1.2.5	(2)(a)	R. 3640. Misleading communications	3640	(2)(i)	S. 13.8. Misleading communications	13.18	(2)(a)	R. 3640. Misleading communications	3640	(2)(i)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 1.2.5 Misleading Communications	1.2.5	(2)(b)	R. 3640. Misleading communications	3640	(2)(ii)	S. 13.8. Misleading communications	13.18	(2)(b)	R. 3640. Misleading communications	3640	(2)(ii)	Adopt existing IDPC Rule provision.
R. 1.2.5 Misleading Communications	1.2.5	(2)(c)	R. 3640. Misleading communications	3640	(2)(iii)	S. 13.8. Misleading communications	13.18	(2)(c)	R. 3640. Misleading communications	3640	(2)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3641. - 3699. Reserved.	3641 - 3699		No equivalent section (NES)	NES		R. 3641. - 3699. Reserved.	3641 - 3699		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part A	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part A	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part B	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part B	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part C	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part C	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part D	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part D	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part E	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part E	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part F	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part F	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part G	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(1) Part G	Adopt existing IDPC Rule provision with numbering reference modification.
R. 2.5.1 Member Responsibilities	2.5.1		R. 3901. Introduction	3901	(2)	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(2)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)	R. 3901. Introduction	3901	(3)	No equivalent section (NES)	NES		R. 3901. Introduction	3901	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3902. - 3903. Reserved.	3902 - 3903		No equivalent section (NES)	NES		R. 3902. - 3903. Reserved.	3902 - 3903		Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)	R. 3904. Policies and procedures	3904	(1)	No equivalent section (NES)	NES		R. 3904. Policies and procedures	3904	(1)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3904. Policies and procedures	3904	(2)(i)	No equivalent section (NES)	NES		R. 3904. Policies and procedures	3904	(2)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3904. Policies and procedures	3904	(2)(ii)	No equivalent section (NES)	NES		R. 3904. Policies and procedures	3904	(2)(ii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3904. Policies and procedures	3904	(2)(iii)	No equivalent section (NES)	NES		R. 3904. Policies and procedures	3904	(2)(iii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3904. Policies and procedures	3904	(2)(iv)	No equivalent section (NES)	NES		R. 3904. Policies and procedures	3904	(2)(iv)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Education)	R. 3904. Policies and procedures	3904	(3)(i)	No equivalent section (NES)	NES		R. 3904. Policies and procedures	3904	(3)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Education)	R. 3904. Policies and procedures	3904	(3)(ii)	No equivalent section (NES)	NES		R. 3904. Policies and procedures	3904	(3)(ii)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Education)	R. 3904. Policies and procedures	3904	(3)(iii)	No equivalent section (NES)		NES	R. 3904. Policies and procedures	3904	(3)(iii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Education)	R. 3904. Policies and procedures	3904	(3)(iv)	No equivalent section (NES)		NES	R. 3904. Policies and procedures	3904	(3)(iv)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Education)	R. 3904. Policies and procedures	3904	(3)(v)	No equivalent section (NES)		NES	R. 3904. Policies and procedures	3904	(3)(v)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Education)	R. 3904. Policies and procedures	3904	(3)(vi)	No equivalent section (NES)		NES	R. 3904. Policies and procedures	3904	(3)(vi)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Education)	R. 3904. Policies and procedures	3904	(3)(vii)	No equivalent section (NES)		NES	R. 3904. Policies and procedures	3904	(3)(vii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3905. Supervisory personnel and resources	3905	(1)	No equivalent section (NES)		NES	R. 3905. Supervisory personnel and resources	3905	(1)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3905. Supervisory personnel and resources	3905	(2)	No equivalent section (NES)		NES	R. 3905. Supervisory personnel and resources	3905	(2)(i)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3905. Supervisory personnel and resources	3905	(3)	No equivalent section (NES)		NES	R. 3905. Supervisory personnel and resources	3906	(2)(ii)	Adopt modified and restructured version of IDPC Rule provision in order to clarify drafting.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3905. Supervisory personnel and resources	3905	(4)	No equivalent section (NES)		NES	R. 3905. Supervisory personnel and resources	3905	(3)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3905. Supervisory personnel and resources	3905	(5)	No equivalent section (NES)		NES	R. 3905. Supervisory personnel and resources	3905	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3905. Supervisory personnel and resources	3905	(6)	No equivalent section (NES)		NES	R. 3905. Supervisory personnel and resources	3905	(5)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3906. Responsibilities of the Supervisor	3906	(1)(i)	No equivalent section (NES)		NES	R. 3906. Responsibilities of the Supervisor	3906	(1)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3906. Responsibilities of the Supervisor	3906	(1)(ii)	No equivalent section (NES)		NES	R. 3906. Responsibilities of the Supervisor	3906	(1)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3906. Responsibilities of the Supervisor	3906	(1)(iii)	No equivalent section (NES)		NES	R. 3906. Responsibilities of the Supervisor	3906	(1)(iii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Delegation of Procedures)	R. 3907. Delegation of supervisory tasks	3907	(1)	No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3907	(1)	Adopt existing IDPC Rule provision.
R. 2.5.8 No Delegation	2.5.8		R. 3907. Delegation of supervisory tasks	3907	(2)	No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3907	(2)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Delegation of Procedures)	R. 3907. Delegation of supervisory tasks	3907	(3)	No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3907	(3)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Delegation of Procedures)	R. 3907. Delegation of supervisory tasks	3907	(4)(i)	No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3907	(4)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Delegation of Procedures)	R. 3907. Delegation of supervisory tasks	3907	(4)(ii)	No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3907	(4)(ii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Delegation of Procedures)	R. 3907. Delegation of supervisory tasks	3907	(4)(iii)	No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3907	(4)(iii)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Delegation of Procedures)	R. 3907. Delegation of supervisory tasks	3907	(5)	No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3907	(5)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Delegation of Procedures)	R. 3907. Delegation of supervisory tasks	3907	(6)	No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3907	(6)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3908	(7)(i)	Adopt new provision with supervision requirements for the delegation of tasks or activities to automation.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3909	(7)(ii)	Adopt new provision with supervision requirements for the delegation of tasks or activities to automation.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)		NES	R. 3907. Delegation of supervisory tasks	3910	(7)(iii)	Adopt new provision with supervision requirements for the delegation of tasks or activities to automation.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Maintaining Procedures)	R. 3908. Supervision records	3908	(1)	No equivalent section (NES)		NES	R. 3908. Supervision records	3908	(1)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Maintaining Procedures)	R. 3908. Supervision records	3908	(2)	No equivalent section (NES)		NES	R. 3908. Supervision records	3908	(2)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Maintaining Procedures)	R. 3908. Supervision records	3908	(3)	No equivalent section (NES)		NES	R. 3908. Supervision records	3908	(3)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Maintaining Procedures)	R. 3908. Supervision records	3908	(4)	No equivalent section (NES)		NES	R. 3908. Supervision records	3908	(4)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Maintaining Procedures)	R. 3908. Supervision records	3908	(5)	No equivalent section (NES)		NES	R. 3908. Supervision records	3908	(5)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3909. Responsibilities of the Executive	3909	(1)	No equivalent section (NES)		NES	R. 3909. Responsibilities of the Executive	3909	(1)	Adopt existing IDPC Rule provision.
R. 2.5.2 Ultimate Designated Person	2.5.2		R. 3910. Responsibilities of the Ultimate Designated Person	3910	(1)	No equivalent section (NES)		NES	R. 3910. Responsibilities of the Ultimate Designated Person	3910	(1)	Adopt existing IDPC Rule provision.
R. 2.5.2 Ultimate Designated Person	2.5.2	(b)(i)	R. 3910. Responsibilities of the Ultimate Designated Person	3910	(2)(i)	S. 5.1. Responsibilities of the ultimate designated person	5.1	(a)	R. 3910. Responsibilities of the Ultimate Designated Person	3910	(2)(i)	Adopt existing IDPC Rule provision.
R. 2.5.2 Ultimate Designated Person	2.5.2	(b)(ii)	R. 3910. Responsibilities of the Ultimate Designated Person	3910	(2)(ii)	S. 5.1. Responsibilities of the ultimate designated person	5.1	(b)	R. 3910. Responsibilities of the Ultimate Designated Person	3910	(2)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3911. Reserved.	3911		No equivalent section (NES)		NES	R. 3911. Reserved.	3911		Adopt existing IDPC Rule provision.
R. 2.5.3 Chief Compliance Officer	2.5.3	(b)(i)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(i)	S. 5.2. Responsibilities of the chief compliance officer	5.2	(a)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(i)	Adopt existing IDPC Rule provision.
R. 2.5.3 Chief Compliance Officer	2.5.3	(b)(ii)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(ii)	S. 5.2. Responsibilities of the chief compliance officer	5.2	(b)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(ii)	Adopt existing IDPC Rule provision.
R. 2.5.3 Chief Compliance Officer	2.5.3	(b)(iii)(A)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(iii)(a)	S. 5.2. Responsibilities of the chief compliance officer	5.2	(c)(i)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(iii)(a)	Adopt existing IDPC Rule provision.
R. 2.5.3 Chief Compliance Officer	2.5.3	(b)(iii)(B)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(iii)(b)	S. 5.2. Responsibilities of the chief compliance officer	5.2	(c)(ii)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(iii)(b)	Adopt existing IDPC Rule provision.
R. 2.5.3 Chief Compliance Officer	2.5.3	(b)(iii)(C)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(iii)(c)	S. 5.2. Responsibilities of the chief compliance officer	5.2	(c)(iii)	R. 3912. Responsibilities of the Chief Compliance Officer	3912	(1)(iii)(c)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 2.5.4 Access to Board	2.5.4		R. 3912. Responsibilities of the Chief Compliance Officer	3912	(2)	S. 11.4 Providing access to the board of directors	11.4		R. 3912. Responsibilities of the Chief Compliance Officer	3912	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(i)	No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(ii)	No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(iii)	No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(iv)(a)	No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(iv)(a)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(iv)(b)	No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(iv)(b)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(iv)(c)	No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(1)(iv)(c)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(2)	No equivalent section (NES)	NES		R. 3913. Responsibilities of the Chief Financial Officer	3913	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3914. Reserved.	3914		No equivalent section (NES)	NES		R. 3914. Reserved.	3914		Adopt existing IDPC Rule provision.
R. 2.5.3 Chief Compliance Officer	2.5.3	(b)(iv)	R. 3915. Report to Dealer Member's board of directors	3915	(1)	S. 5.2. Responsibilities of the chief compliance officer	5.2	(d)	R. 3915. Report to Dealer Member's board of directors	3915	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3915. Report to Dealer Member's board of directors	3915	(2)	No equivalent section (NES)	NES		R. 3915. Report to Dealer Member's board of directors	3915	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3915. Report to Dealer Member's board of directors	3915	(3)	No equivalent section (NES)	NES		R. 3915. Report to Dealer Member's board of directors	3915	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3915. Report to Dealer Member's board of directors	3915	(4)	No equivalent section (NES)	NES		R. 3915. Report to Dealer Member's board of directors	3915	(4)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3916. Governance document	3916	(1)(i)	No equivalent section (NES)	NES		R. 3916. Governance document	3916	(1)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3916. Governance document	3916	(1)(ii)	No equivalent section (NES)	NES		R. 3916. Governance document	3916	(1)(ii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3917. Annual supervisory review of financial and operational policies and procedures	3917	(1)	No equivalent section (NES)	NES		R. 3917. Annual supervisory review of financial and operational policies and procedures	3917	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(1)(i)	No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(1)(i)	Adopt existing IDPC Rule provision with updated reference to consolidated provisions regarding shared office premises.
No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(1)(ii)	No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(1)(ii)	Adopt existing IDPC Rule provision with updated reference to consolidated provisions regarding shared office premises.
No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(2)(i)	No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(2)(i)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(2)(ii)	No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(2)(ii)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(2)(iii)	No equivalent section (NES)	NES		R. 3918. Supervision of shared office premises	3918	(2)(iii)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3919. - 3924. Reserved.	3919 - 3924		No equivalent section (NES)	NES		R. 3919. - 3924. Reserved.	3919 - 3924		Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)	R. 3925. Supervision by designated persons	3925	(1)	No equivalent section (NES)	NES		R. 3925. Supervision by designated persons	3925	(1)	Adopt existing IDPC Rule provision.
R. 2.2.3 New Account Approval	2.2.3		R. 3925. Supervision by designated persons	3925	(2)	No equivalent section (NES)	NES		R. 3925. Supervision by designated persons	3925	(2)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)	R. 3925. Supervision by designated persons	3925	(3)	No equivalent section (NES)	NES		R. 3925. Supervision by designated persons	3925	(3)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)	R. 3925. Supervision by designated persons	3925	(4)	No equivalent section (NES)	NES		R. 3925. Supervision by designated persons	3925	(4)	Adopt existing IDPC Rule provision with a clear drafting modification.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3926. Account supervision policies and procedures	3926	(1)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(1)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3926. Account supervision policies and procedures	3926	(2)(i)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(2)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3926. Account supervision policies and procedures	3926	(2)(ii)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(2)(ii)	Adopt existing IDPC Rule provision with replacement of the term "securities" with "investment".
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3926. Account supervision policies and procedures	3926	(2)(iii)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(2)(iii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3926. Account supervision policies and procedures	3926	(3)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(3)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3926. Account supervision policies and procedures	3926	(4)(i)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(4)(i)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3926. Account supervision policies and procedures	3926	(4)(ii)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(4)(ii)	Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(I. Establishing and Maintaining Procedures)(Establishing Procedures)	R. 3926. Account supervision policies and procedures	3926	(5)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(5)	Adopt existing IDPC Rule provision.
R. 500 Branch Review Requirements	500		R. 3926. Account supervision policies and procedures	3926	(6)	No equivalent section (NES)	NES		R. 3926. Account supervision policies and procedures	3926	(6)	Adopt existing IDPC Rule provision with updated reference to "business locations" rather than "branch offices".
R. 2.5.7 Maintenance of Supervisory Review Documentation	2.5.7		R. 3927. Reviews of account activity	3927	(1)	No equivalent section (NES)	NES		R. 3927. Reviews of account activity	3927	(1)	Adopt existing IDPC Rule provision.
R. 2.5.7 Maintenance of Supervisory Review Documentation	2.5.7		R. 3927. Reviews of account activity	3927	(2)	No equivalent section (NES)	NES		R. 3927. Reviews of account activity	3927	(2)	Adopt existing IDPC Rule provision.
R. 2.5.7 Maintenance of Supervisory Review Documentation	2.5.7		R. 3927. Reviews of account activity	3927	(3)	No equivalent section (NES)	NES		R. 3927. Reviews of account activity	3927	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3928. - 3944. Reserved.	3928 - 3944		No equivalent section (NES)	NES		R. 3928. - 3944. Reserved.	3928 - 3944		Adopt existing IDPC Rule provision.
R. 200 Minimum Standards for Account Supervision	200	(VI. Identification of Trends in Trading Activity)	R. 3945. Daily and monthly trade supervision	3945	(1)	No equivalent section (NES)	NES		R. 3945. Daily and monthly trade supervision	3945	(1)	Adopt existing IDPC Rule provision.

[illegible]

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
R. 200 Minimum Standards for Account Supervision	200	(I. Opening New Accounts)(Documentation of Client Account Information)(5.)	R. 3945. Daily and monthly trade supervision	3945	(4)(ii)	No equivalent section (NES)		NES	R. 3945. Daily and monthly trade supervision	3945	(4)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
R. 200 Minimum Standards for Account Supervision	200	(II. Opening New Accounts)(Documentation of Client Account Information)(5.)	R. 3945. Daily and monthly trade supervision	3945	(4)(iii)	No equivalent section (NES)		NES	R. 3945. Daily and monthly trade supervision	3945	(4)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
R. 200 Minimum Standards for Account Supervision	200	(II. Opening New Accounts)(Documentation of Client Account Information)(5.)	R. 3945. Daily and monthly trade supervision	3945	(4)(iv)	No equivalent section (NES)		NES	R. 3945. Daily and monthly trade supervision	3945	(4)(iv)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
R. 200 Minimum Standards for Account Supervision	200	(II. Opening New Accounts)(Documentation of Client Account Information)(5.)	R. 3945. Daily and monthly trade supervision	3945	(4)(v)	No equivalent section (NES)		NES	R. 3945. Daily and monthly trade supervision	3945	(4)(v)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
R. 200 Minimum Standards for Account Supervision	200	(II. Opening New Accounts)(Documentation of Client Account Information)(5.)	No equivalent section (NES)		NES	No equivalent section (NES)		NES	R. 3945. Daily and monthly trade supervision	3945	(5)(i)	Adopt MFD Rule provision requiring that mutual fund dealers to specifically designate for supervision purposes, leveraged accounts, registered accounts and accounts where the Registered Representative has full or partial control or authority over the financial affairs of the client who is a Related Person of the Adopt MFD Rule provision requiring that mutual fund dealers to specifically designate for supervision purposes, leveraged accounts, registered accounts and accounts where the Registered Representative has full or partial control or authority over the financial affairs of the client who is a Related Person of the Adopt MFD Rule provision requiring that mutual fund dealers to specifically designate for supervision purposes, leveraged accounts, registered accounts and accounts where the Registered Representative has full or partial control or authority over the financial affairs of the client who is a Related Person of the
R. 200 Minimum Standards for Account Supervision	200	(II. Opening New Accounts)(Documentation of Client Account Information)(5.)	No equivalent section (NES)		NES	No equivalent section (NES)		NES	R. 3945. Daily and monthly trade supervision	3945	(5)(ii)	
R. 200 Minimum Standards for Account Supervision	200	(II. Opening New Accounts)(Documentation of Client Account Information)(5.)	No equivalent section (NES)		NES	No equivalent section (NES)		NES	R. 3945. Daily and monthly trade supervision	3945	(5)(iii)	
R. 500 Branch Review Requirements	500		R. 3946. Additional supervisory responsibilities	3946	(1)(i)	No equivalent section (NES)		NES	R. 3946. Additional supervisory responsibilities	3946	(1)(i)	Adopt existing IDPC Rule provisio with a clear drafting modification.
R. 500 Branch Review Requirements	500		R. 3946. Additional supervisory responsibilities	3946	(1)(ii)	No equivalent section (NES)		NES	R. 3946. Additional supervisory responsibilities	3946	(1)(ii)	Adopt existing IDPC Rule provisio with a clear drafting modification.
R. 500 Branch Review Requirements	500		R. 3946. Additional supervisory responsibilities	3946	(1)(iii)	No equivalent section (NES)		NES	R. 3946. Additional supervisory responsibilities	3946	(1)(iii)	Adopt existing IDPC Rule provisio with a clear drafting modification.
R. 500 Branch Review Requirements	500		R. 3946. Additional supervisory responsibilities	3946	(1)(iv)	No equivalent section (NES)		NES	R. 3946. Additional supervisory responsibilities	3946	(1)(iv)	Adopt existing IDPC Rule provisio with a clear drafting modification.
R. 100 New Registrant Training and Supervision	100	(Supervision Policy)	R. 3947. Supervision of new Registered Representatives and Investment Representatives	3947	(1)	No equivalent section (NES)		NES	R. 3947. Supervision of new Registered Representatives and Investment Representatives	3947	(1)	Adopt existing IDPC Rule provision.
R. 100 New Registrant Training and Supervision	100	(Supervision Policy)	R. 3947. Supervision of new Registered Representatives and Investment Representatives	3947	(3)	No equivalent section (NES)		NES	R. 3947. Supervision of new Registered Representatives and Investment Representatives	3947	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3948. Supervision of suitability determination obligations	3948	(1)	No equivalent section (NES)		NES	R. 3948. Supervision of suitability determination obligations	3948	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3949. Reserved.	3949		No equivalent section (NES)		NES	R. 3949. Reserved.	3949		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(1)	No equivalent section (NES)		NES	R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(i)	No equivalent section (NES)		NES	R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(i)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(ii)	No equivalent section (NES)		NES	R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(ii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(iii)	No equivalent section (NES)		NES	R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(iii)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(iv)	No equivalent section (NES)		NES	R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(iv)	Adopt existing IDPC Rule provision with addition of investment products defined term.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(v)	No equivalent section (NES)	NES		R. 3950. Supervisory policies and procedures for institutional client accounts	3950	(2)(v)	Adopt existing IDPC Rule provision with addition of investment products defined term.
No equivalent section (NES)	NES		R. 3951. Supervision of suitability determination obligations	3951	(1)	No equivalent section (NES)	NES		R. 3951. Supervision of suitability determination obligations	3951	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3952. - 3954. Reserved.	3952 - 3954		No equivalent section (NES)	NES		R. 3952. - 3954. Reserved.	3952 - 3954		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(i)	No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and addition of investment products defined term.
No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(ii)(a)	No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(ii)(a)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting modification.
No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(ii)(b)	No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(ii)(b)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting modification.
No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(ii)(c)	No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(ii)(c)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting modification.
No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(iii)	No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(1)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(2)	No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(3)	No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(3)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(4)	No equivalent section (NES)	NES		R. 3955. Supervision of order execution only accounts	3955	(4)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3956. - 3959. Reserved.	3956 - 3959		No equivalent section (NES)	NES		R. 3956. - 3959. Reserved.	3956 - 3959		Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(1)(i)	No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting restructuring.
No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(1)(ii)	No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting restructuring.
No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(2)	No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(4)	Modify the numbering of the provision in order to clarify the drafting.
No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(3)	No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting restructuring.
No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(4)(i)	No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(3)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting restructuring.
No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(4)(ii)	No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(3)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting restructuring.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(4)	Adopt new provision regarding qualifications and experience for the supervision of derivatives accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(5)	Adopt new provision requiring policies and procedures regarding the supervision of derivatives accounts.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3960. Supervision of derivatives accounts	3960	(6)	Adopt new provision regarding identifying derivatives accounts for the purposes of supervision.
No equivalent section (NES)	NES		R. 3961. Responsibility of designated Supervisors for derivatives accounts	3961	(1)(i)	No equivalent section (NES)	NES		R. 3961. Responsibility of designated Supervisors for derivatives accounts	3961	(1)(i)	Adopt existing IDPC Rule provision with modification clarifying supervisory responsibility regarding derivatives trading agreements signed by the client..
No equivalent section (NES)	NES		R. 3961. Responsibility of designated Supervisors for derivatives accounts	3961	(1)(ii)	No equivalent section (NES)	NES		R. 3961. Responsibility of designated Supervisors for derivatives accounts	3961	(1)(ii)	Adopt existing IDPC Rule provision with clear drafting modification.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3961. Responsibility of designated Supervisors for derivatives accounts	3961	(2)	Adopt new provision clarifying supervisory responsibilities for determining risk characteristics for derivatives accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3961. Responsibility of designated Supervisors for derivatives accounts	3961	(3)	Adopt new provision clarifying record keeping requirements of supervisory approvals.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(1)(i)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(1)(i)	Adopt existing IDPC Rule provision with clear drafting modification.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(1)(ii)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(1)(ii)	Adopt existing IDPC Rule provision with clear drafting modification.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(1)(iii)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(1)(iii)	Adopt existing IDPC Rule provision with clear drafting modification.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(2)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(2)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(3)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(3)	Adopt existing IDPC Rule provision with clear drafting modification.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(4)(i)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(4)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(4)(ii)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(4)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(4)(iii)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(4)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(4)(iv)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(4)(iv)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(i)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members and clear drafting.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(ii)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(iii)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(iii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(iv)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(iv)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(v)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(v)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(vi)	No equivalent section (NES)	NES		R. 3962. Supervision of retail derivatives accounts	3962	(5)(vi)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3970. Supervision of discretionary accounts	3970	(4)	Adopt new and restructured provision to clarify requirements and drafting regarding supervision of discretionary accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3970. Supervision of discretionary accounts	3970	(5)	Adopt new and restructured provision to clarify requirements and drafting regarding supervision of discretionary accounts.
	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3970. Supervision of discretionary accounts	3970	(6)	Adopt new and restructured provision to clarify requirements and drafting regarding supervision of discretionary accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(1)(i)	Adopt new and restructured provision to clarify requirements and drafting regarding responsibility of Supervisors for discretionary accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(1)(ii)	Adopt new and restructured provision to clarify requirements and drafting regarding responsibility of Supervisors for discretionary accounts.
No equivalent section (NES)	NES		R. 3970. Supervision for discretionary accounts	3970	(1)	No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(2)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3970. Supervision for discretionary accounts	3970	(2)	No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(3)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3970. Supervision for discretionary accounts	3970	(3)	No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(4)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3970. Supervision for discretionary accounts	3970	(4)(i)	No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(5)(i)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3970. Supervision for discretionary accounts	3970	(4)(ii)	No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(5)(ii)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3970. Supervision for discretionary accounts	3970	(4)(iii)	No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(5)(iii)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		R. 3970. Supervision for discretionary accounts	3970	(5)	No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(6)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3971. Responsibility of Supervisors for discretionary accounts	3971	(7)	Adopt new provision clarifying record keeping requirements of supervisory approvals.
No equivalent section (NES)	NES		R. 3971. Supervision of managed accounts	3971	(1)(i)	No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(1)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(2)	Adopt new and restructured provision to clarify requirements and drafting regarding supervision of managed accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(3)(i)	Adopt new and restructured provision to clarify requirements and drafting regarding supervision of managed accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(3)(ii)	Adopt new and restructured provision to clarify requirements and drafting regarding supervision of managed accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(4)	Adopt new and restructured provision to clarify requirements and drafting regarding supervision of managed accounts.
No equivalent section (NES)	NES		R. 3971. Supervision of managed accounts	3971	(1)(ii)	No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(5)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting and specify application to Investment Dealer members.
No equivalent section (NES)	NES		R. 3971. Supervision of managed accounts	3971	(2)(i)	No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(6)(i)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting and specify application to Investment Dealer members.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 3971. Supervision of managed accounts	3971	(2)(ii)	No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(6)(ii)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting and specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3971. Supervision of managed accounts	3971	(3)	No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(6)(iii)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting and specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3971. Supervision of managed accounts	3971	(4)(i)	No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(7)(i)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting and specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3971. Supervision of managed accounts	3971	(4)(ii)	No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(7)(ii)	Adopt renumbered and restructured version of IDPC Rule provision in order to clarify drafting and specify application to Investment Dealer Members.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3972. Supervision of managed accounts	3972	(8)	Adopt new provision regarding identifying managed accounts for the purposes of supervision.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3973. Responsibility of Supervisors for managed accounts	3973	(1)(i)	Adopt new provision to clarify requirements and drafting regarding responsibility of Supervisors for managed accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3973. Responsibility of Supervisors for managed accounts	3973	(1)(ii)	Adopt new provision to clarify requirements and drafting regarding responsibility of Supervisors for managed accounts.
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 3973. Responsibility of Supervisors for managed accounts	3973	(2)	Adopt new provision clarifying record keeping requirements of supervisory approvals.
No equivalent section (NES)	NES		R. 3972. Managed account committee	3972	(1)(i)	No equivalent section (NES)	NES		R. 3974. Managed account committee	3974	(1)(i)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3972. Managed account committee	3972	(1)(ii)	No equivalent section (NES)	NES		R. 3974. Managed account committee	3974	(1)(ii)	Adopt existing IDPC Rule provision with modification to specify application to Investment Dealer Members.
No equivalent section (NES)	NES		R. 3973. Managed account review	3973	(1)(i)	No equivalent section (NES)	NES		R. 3975. Managed account review	3975	(1)(i)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3973. Managed account review	3973	(1)(ii)	No equivalent section (NES)	NES		R. 3975. Managed account review	3975	(1)(ii)	Adopt existing IDPC Rule provision with numbering reference modification.
No equivalent section (NES)	NES		R. 3973. Managed account review	3973	(2)	No equivalent section (NES)	NES		R. 3975. Managed account review	3975	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 3974. - 3999. Reserved.	3974 - 3999		No equivalent section (NES)	NES		R. 3976. - 3999. Reserved.	3976 - 3999		Adopt renumbered reserved series.
No equivalent section (NES)	NES		R. 8402 Definitions	8402	(1) "regulatory decision"	No equivalent section (NES)	NES		R. 8402 Definitions	8402	(1) "regulatory decision"	Adopt a modified version of the current IDPC Rule provision to more accurately list all decisions reviewable by a hearing panel pursuant to Rule 9300
ROP. 16.1 Notice of Appeal	ROP. 16.1	(2)-(3)	R. 8430 Regulatory review hearings	8430	(1)	No equivalent section (NES)	NES		R. 8430 Regulatory review hearings	8430	(1)	Adopt a modified version of the current IDPC Rule provision to more accurately list all decisions reviewable by a hearing panel pursuant to Rule 9300
No equivalent section (NES)	NES		R. 9201. Introduction	9201	(1)	No equivalent section (NES)	NES		R. 9201. Introduction	9201	(1)	Adopt a modified version of the current IDPC Rule provision to more accurately describe the content of Rule 9200
No equivalent section (NES)	NES		R. 9202. Definitions	9202	(1) "application"	No equivalent section (NES)	NES		R. 9202. Definitions	9202	(1) "application"	Adopt existing IDPC Rule provision
No equivalent section (NES)	NES		R. 9202. Definitions	9202	(1) "decision"	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule defined term
No equivalent section (NES)	NES		R. 9202. Definitions	9202	(1) "Registration Staff"	No equivalent section (NES)	NES		R. 9202. Definitions	9202	(1) "Registration Staff"	Adopt existing IDPC Rule Provision

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 9202. Definitions	9202	(1) "regulatory decision"	Introduce a definition for regulatory decisions
No equivalent section (NES)	NES		R. 9202. Definitions	9202	(1) "senior review officer"	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule defined term
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 9202. Definitions	9202	(1) "Senior Decision Officer"	Adopt new definition to clarify the decision-maker empowered to make initial regulatory decisions under Rule 9200
No equivalent section (NES)	NES		R. 9203. Corporation Decisions	9203	(1)	No equivalent section (NES)	NES		R. 9203. Requirements for regulatory decisions	9203	(1)	Adopt a modified version of the current IDPC Rule provision to make the provision applicable to all regulatory decisions under Rule 9200
No equivalent section (NES)	NES		R. 9203. Corporation Decisions	9203	(2)	No equivalent section (NES)	NES		R. 9203. Requirements for regulatory decisions	9203	(2)	Adopt a modified version of the current IDPC Rule provision to make the provision applicable to all regulatory decisions under Rule 9200 and to clarify that the opportunity to be heard is exercised in front of a Senior Decision Officer
No equivalent section (NES)	NES		R. 9203. Corporation Decisions	9203	(3)	No equivalent section (NES)	NES		R. 9203. Requirements for regulatory decisions	9203	(3)	Adopt a modified version of the current IDPC Rule provision to make the provision applicable to all regulatory decisions under Rule 9200 and to clarify that the written reasons are to be provided in the form of a letter
No equivalent section (NES)	NES		R. 9203. Corporation Decisions	9203	(4)	No equivalent section (NES)	NES		R. 9203. Requirements for regulatory decisions	9203	(4)	Adopt a modified version of the current IDPC Rule provision to make the provision applicable to all regulatory decisions under Rule 9200 and to update the reference to section 9209.
No equivalent section (NES)	NES		R. 9204. Individual approval applications	9204	(1)	No equivalent section (NES)	NES		R. 9204. Individual approval applications	9204	(1)	Adopt a modified version of the current IDPC Rule provision to make the provision applicable to Approved persons of both types of Dealer Members
No equivalent section (NES)	NES		R. 9204. Individual approval applications	9204	(2)	No equivalent section (NES)	NES		R. 9204. Individual approval applications	9204	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9204. Individual approval applications	9204	(3)	No equivalent section (NES)	NES		R. 9204. Individual approval applications	9204	(3)	Adopt existing IDPC Rule provision.
R. 8.2. Review	8.2		R. 9205. Membership approval applications	9205	(1)	No equivalent section (NES)	NES		R. 9205. Membership approval applications	9205	(1)	Adopt existing IDPC Rule provision, modified for consistency with CRO's General By-Law No 1.
No equivalent section (NES)	NES		R. 9205. Membership approval applications	9205	(2)	No equivalent section (NES)	NES		R. 9205. Membership approval applications	9205	(3)	Adopt existing IDPC Rule provision, renumbered to subsection 9205(3) and modified to include an opportunity to be heard and receive notice of the intended decision and the reasons for it, if the Board intends to not follow Staff's recommendation provided for under subsection 9205(1)
No equivalent section (NES)	NES		R. 9205. Membership approval applications	9205	(3)	No equivalent section (NES)	NES		R. 9205. Membership approval applications	9205	(2)	Adopt existing IDPC Rule provision, renumbered to subsection 9205(2) and modified for consistency with CRO's General By-Law No 1.
R. 8.2. Review	8.2		R. 9205. Membership approval applications	9205	(4)	No equivalent section (NES)	NES		R. 9205. Membership approval applications	9205	(4)	Adopt existing IDPC Rule provision, modified to reflect the renumbering of subsection 9205(3) to subsection 9205(2)
No equivalent section (NES)	NES		R. 9206. Exemption applications	9206	(1)	No equivalent section (NES)	NES		R. 9206. Exemption applications for proficiency and continuing education requirements	9206	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9206. Exemption applications	9206	(2)	No equivalent section (NES)	NES		R. 9206. Exemption applications for proficiency and continuing education requirements	9206	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9207. Continued approval	9207	(1)	No equivalent section (NES)	NES		R. 9207. Continued individual approval	9207	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9207. Continued approval	9207	(2)	No equivalent section (NES)	NES		R. 9207. Continued individual approval	9207	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9208. Terms and conditions on membership	9208	(1)	No equivalent section (NES)	NES		R. 9208. Terms and conditions on Dealer Members' Membership	9208	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9208. Terms and conditions on membership	9208	(2)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal the provision as this is covered by subsection 9203(2) following the modifications made to that subsection and the new definition of "regulatory decision"

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 9208. Terms and conditions on membership	9208	(3)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal the provision as this is covered by subsection 9203(3) following the modifications made to that subsection and the new definition of "regulatory decision"
No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(1)	No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(1)	Adopt a modified version of the current IDPC Rule provision to be applicable to all regulatory decisions under Rule 9200.
No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(2)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300
No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(3)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300
No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(4)	No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(2)	Adopt and renumber existing IDPC Rule subsection 9209(4) as subsection 9209(2), modified to clarify this provision only applies to requests for review of decisions made under section 9206, if the review is initiated by Registration Staff.
No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(5)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300
No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(6)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300
No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(7)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300
No equivalent section (NES)	NES		R. 9209. Review Hearings	9209	(8)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300
No equivalent section (NES)	NES		R. 9210. Review by a securities regulatory authority	9210	(1)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300, which includes a similar subsection 9305(1).
No equivalent section (NES)	NES		R. 9210. Review by a securities regulatory authority	9210	(2)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300, which includes a similar subsection 9305(2).
No equivalent section (NES)	NES		R. 9210. Review by a securities regulatory authority	9210	(3)	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as the review of regulatory decisions made under section 9206 will be exercised in front of a hearing panel per Rule 9300, which includes a similar subsection 9305(3).
No equivalent section (NES)	NES		R. 9301. Introduction	9301	(1)	No equivalent section (NES)	NES		R. 9301. Introduction	9301	(1)	Adopt a modified version of the current IDPC Rule provision to more accurately list all decisions reviewable by a hearing panel pursuant to Rule 9300
No equivalent section (NES)	NES		R. 9302. Definitions	9302	(1) "application"	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as decisions made under section 9204 are included under the new definition of "regulatory decision"
No equivalent section (NES)	NES		R. 9302. Definitions	9302	(1) "approval order"	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as decisions made under section 9207 are included under the new definition of "regulatory decision"
No equivalent section (NES)	NES		R. 9302. Definitions	9302	(1) "compliance order"	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as decisions made under section 9208 are included under the new definition of "regulatory decision"
No equivalent section (NES)	NES		R. 9302. Definitions	9302	(1) "decision"	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, made redundant by the new "regulatory decision" definition
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 9302. Definitions	9302	(1) "regulatory decision"	Introduce a definition for regulatory decisions
No equivalent section (NES)	NES		R. 9302. Definitions	9302	(1) "early warning review order"	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal this provision, as decisions made under section 4136 are included under the new definition of "regulatory decision"
No equivalent section (NES)	NES		R. 9303. Hearings and decisions	9303	(1)	No equivalent section (NES)	NES		R. 9303. Hearings and decisions	9303	(1)	Adopt existing IDPC Rule provision.

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 9303. Hearings and decisions	9303	(2)	No equivalent section (NES)	NES		R. 9303. Hearings and decisions	9303	(2)	Adopt a modified version of the current IDPC Rule provision to account for the change of name of "National Hearing Officer" to "Hearing Office"
No equivalent section (NES)	NES		R. 9304. Review proceedings	9304	(1)	No equivalent section (NES)	NES		R. 9304. Review proceedings	9304	(1)	Adopt a modified version of the current IDPC Rule provision to account for the new definition of "regulatory decision"
No equivalent section (NES)	NES		R. 9304. Review proceedings	9304	(2)	No equivalent section (NES)	NES		R. 9304. Review proceedings	9304	(2)	Adopt a modified version of the current IDPC Rule provision to account for the new definition of "regulatory decision"
R. 7.5 Review of decisions	7.5		R. 9305. Review by a securities regulatory authority	9305	(1)	No equivalent section (NES)	NES		R. 9305. Review by a securities regulatory authority	9305	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9305. Review by a securities regulatory authority	9305	(2)	No equivalent section (NES)	NES		R. 9305. Review by a securities regulatory authority	9305	(2)	Adopt a modified version of the current IDPC Rule provision to account for the new definition of "regulatory decision"
No equivalent section (NES)	NES		R. 9305. Review by a securities regulatory authority	9305	(3)	No equivalent section (NES)	NES		R. 9305. Review by a securities regulatory authority	9305	(3)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9401. Introduction	9401	(1)	No equivalent section (NES)	NES		R. 9401. Introduction	9401	(1)	Adopt a modified version of the current IDPC Rule provision to account for the changes in decision makers under Rule 9200.
No equivalent section (NES)	NES		R. 9401. Introduction	9401	(2)	No equivalent section (NES)	NES		R. 9401. Introduction	9401	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9401. Introduction	9401	(3)	No equivalent section (NES)	NES		R. 9401. Introduction	9401	(3)	Adopt a modified version of the current IDPC Rule provision to account for the change in spelling of the term "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9402. Definitions	9402	(1) "decision maker"	No equivalent section (NES)	NES		No equivalent section (NES)	NES		Repeal existing IDPC Rule defined term
No equivalent section (NES)	NES		R. 9402. Definitions	9402	(1) "Registration or Compliance Staff"	No equivalent section (NES)	NES		R. 9402. Definitions	9402	(1) "Registration or Compliance Staff"	Adopt a modified version of the current IDPC Rule provision to clarify that both Registration as Compliance Staff are included under this definition
No equivalent section (NES)	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 9402. Definitions	9402	(1) "regulatory decision"	Introduce a definition for regulatory decisions
No equivalent section (NES)	NES		R. 9402. Definitions	9402	(1) "senior decision officer"	No equivalent section (NES)	NES		R. 9402. Definitions	9402	(1) "Senior Decision Officer"	Adopt a modified version of the current IDPC Rule provision to include all regulatory decisions under the authority of a Senior Decision Officer under Rule 9200, as well as the change in spelling of the term "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9403. Opportunities to be heard by a senior decision officer	9403	(1)	No equivalent section (NES)	NES		R. 9403. Opportunities to be heard by a Senior Decision Officer	9403	(1)	Adopt a modified version of the current IDPC Rule provision to include all parties who can request an opportunity to be heard pursuant to subsection 9203(2), as well as the change in spelling of the term "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9403. Opportunities to be heard by a senior decision officer	9403	(2)	No equivalent section (NES)	NES		R. 9403. Opportunities to be heard by a Senior Decision Officer	9403	(2)	Adopt a modified version of the current IDPC Rule provision to account for the change in spelling of the term "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9404. Counsel	9404	(1)	No equivalent section (NES)	NES		R. 9404. Counsel	9404	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9404. Counsel	9404	(2)	No equivalent section (NES)	NES		R. 9404. Counsel	9404	(2)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff"
No equivalent section (NES)	NES		R. 9405. Corporation Staff Notice	9405	(1)	No equivalent section (NES)	NES		R. 9405. Corporation Staff Notice	9405	(1)	Adopt a modified version of the current IDPC Rule provision to clarify the scope of the provision
No equivalent section (NES)	NES		R. 9406. Response of applicant, Approved Person or Dealer Member	9406	(1)	No equivalent section (NES)	NES		R. 9406. Response of applicant, Approved Person or Dealer Member	9406	(1)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff" and the new definition of "regulatory decision"
No equivalent section (NES)	NES		R. 9406. Response of applicant, Approved Person or Dealer Member	9406	(2)	No equivalent section (NES)	NES		R. 9406. Response of applicant, Approved Person or Dealer Member	9406	(2)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff"

Existing MFD Rule			Existing IDPC Rule			Existing NI 31-103 requirement			New DCR			Proposed Action
Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	Number and Title	Section reference	Subsection reference	
No equivalent section (NES)	NES		R. 9406. Response of applicant, Approved Person or Dealer Member	9406	(3)	No equivalent section (NES)	NES		R. 9406. Response of applicant, Approved Person or Dealer Member	9406	(3)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff", the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9407. Choice of written submissions or appearance	9407	(1)	No equivalent section (NES)	NES		R. 9407. Choice of written submissions or appearance	9407	(1)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff", the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9407. Choice of written submissions or appearance	9407	(2)	No equivalent section (NES)	NES		R. 9407. Choice of written submissions or appearance	9407	(2)	Adopt a modified version of the current IDPC Rule provision to account for the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9407. Choice of written submissions or appearance	9407	(3)	No equivalent section (NES)	NES		R. 9407. Choice of written submissions or appearance	9407	(3)	Adopt a modified version of the current IDPC Rule provision to account for the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(1)	No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(2)	No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(2)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff"
No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(3)	No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(3)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff"
No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(4)	No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(4)	Adopt a modified version of the current IDPC Rule provision to account for the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(5)	No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(5)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff", the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(6)	No equivalent section (NES)	NES		R. 9408. Exchange of written submissions	9408	(6)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff", the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9409. Appearance before a decision maker	9409	(1)	No equivalent section (NES)	NES		R. 9409. Appearance before a Senior Decision Officer	9409	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9409. Appearance before a decision maker	9409	(2)	No equivalent section (NES)	NES		R. 9409. Appearance before a Senior Decision Officer	9409	(2)	Adopt a modified version of the current IDPC Rule provision to account for the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9409. Appearance before a decision maker	9409	(3)	No equivalent section (NES)	NES		R. 9409. Appearance before a Senior Decision Officer	9409	(3)	Adopt a modified version of the current IDPC Rule provision to account for the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9410. Decisions	9410	(1)	No equivalent section (NES)	NES		R. 9410. Decisions	9410	(1)	Adopt a modified version of the current IDPC Rule provision to account for the change in the defined term "Registration Staff" to "Registration and Compliance Staff", the repeal of the definition of "decision maker" and the modified definition of "Senior Decision Officer"
No equivalent section (NES)	NES		R. 9411. Opportunities to be heard by the Board	9411	(1)	No equivalent section (NES)	NES		R. 9411. Opportunities to be heard by the Board	9411	(1)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9411. Opportunities to be heard by the Board	9411	(2)	No equivalent section (NES)	NES		R. 9411. Opportunities to be heard by the Board	9411	(2)	Adopt existing IDPC Rule provision.
No equivalent section (NES)	NES		R. 9412. Corporation Staff Notice	9412	(1)	No equivalent section (NES)	NES		R. 9412. Corporation Staff Notice	9412	(1)	Adopt a modified version of the current IDPC Rule provision so that applicants receive a copy of Corporation staff's recommendation and reasons for it, regardless of the nature of the recommendation
R. 8.2. Review	NES		No equivalent section (NES)	NES		No equivalent section (NES)	NES		R. 9412. Corporation Staff Notice	9412	(2)	Adopt new provision, specifying the notice of the Board's intended decision and reasons for it should be provided in the form of a letter when such notice and reasons are required per clause 9205(3)(iii)
ROP. 18.1 Request for Membership Application Hearing	ROP. 18.1	(1)	R. 9413. Response of applicant, Approved Person or Dealer Member	9413	(1)	No equivalent section (NES)	NES		R. 9413. Response of applicant, Approved Person or Dealer Member	9413	(1)	Adopt a modified version of the current IDPC Rule provision to account for the opportunity to be heard and receive notice of the intended decision and the reasons for it, if the Board intends to not follow Staff's recommendation provided for under subsection 9206(1), introduced in clause 9206(3)
ROP. 18.1 Request for Membership Application Hearing	ROP. 18.1	(2)	R. 9413. Response of applicant, Approved Person or Dealer Member	9413	(2)	No equivalent section (NES)	NES		R. 9413. Response of applicant, Approved Person or Dealer Member	9413	(2)	Adopt existing IDPC Rule provision.

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