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Date: 4/7/2006 7:11:14 PM
Subject: RE: CCIR/CISRO Consultation Paper on Managing Conflicts ofInterest

Apologies for my tardiness in responding to the Consultation Paper.

1. I see these measures as good first steps but am not certain that they are strong enough to effect meaningful change. As a buyer as well as a seller of insurance, our experience sees this issue from both sides. In a recent experience with a large broker, the specific question was asked as to the amount of commission which would be paid to the broker for the placing of our business. The answer was short, accurate and complete and was delivered without hesitation. That is the way it should be. The proposed measures won't bring that about as the level of compensation is a range and is only required to be on the website. Many, perhaps most consumers won't go to the website and won't ask the right question. Our hope would be to see greater transparency in the next iteration of these policies.

2. We don't see any difficulties from our perspective.

3. The associations could provide samples and minimum standards. There would also be a need for training and education, particularly for smaller brokers.