



February 22, 2024

Mr. Tim Miflin

Financial Services Regulatory Authority of Ontario (FSRA)

BY EMAIL TO:

Tim.miflin@fsrao.ca

Dear Sirs,

**RE: FSRA Consultation on proposed Guidance:
*Life Insurance Agent and MGA Licensing Suitability***

IDC Worldsource Insurance Network Inc. (IDC WIN) is an established managing general agency (MGA) with a singular focus – to be the primary MGA for independent Advisors across Canada.

We aim to provide Advisors with a comprehensive and flexible approach to meet the challenges of a changing financial landscape. An established and tenured leadership team supports Advisors; a team who embrace innovation and are committed to sharing their robust insurance industry knowledge.

IDC WIN welcomes the opportunity to provide general comments with respect to the proposed guidance and request for comments dated November 21, 2023.

IDC Worldsource Insurance Network Inc.
Phil Marsillo, President and CEO

www.idcwin.ca

5705 Cancross Court, Suite 200
Mississauga, ON L5R3E9
T: 905-366-3866 x 216 | F: 905-366-3877
TF: 1-877-742-5432 ext. 3216

Our general comments are as follows:

We agree that a regulatory framework addressing agent suitability and distributor oversight are essential to consumer protection and maintaining industry-wide standards. We believe that a collaborative approach is the best way forward to achieve collective desired results.

We are supportive of Fair Treatment of Customers (FTC) Guidelines; taking additional steps to ensure the consumer receives the desired outcome throughout the life cycle of the insurance product, and that the products recommended, are appropriate, to meet the customers' needs.

We agree that distribution channels have evolved over time and that independent distribution provides insurance and financial services solutions to a significant percentage of the Canadian population, including in remote areas.

We agree that the marketplace and regulatory environment is changing and will continue to do so. We look forward to future industry consultations in the development of any proposed rules or guidelines to meet those changes.

We believe all those party to the insurance transaction should be governed by the same rules of engagement.

We agree with and appreciate what the guidance seeks to achieve, however, we have concerns with the guidance in the current form. We would recommend more clarity into each party's separate or overlapping obligations, to mitigate uncertainty and leave less room for interpretation. For example, clear accountabilities for carriers, distributors, and advisors.

We appreciate the need for the distributor to be aware of advisor actions that are not in the best interest of consumers, however, we believe accountability for advisors' actions or inactions cannot rest solely on the distributors or carriers. Licensees are ultimately responsible for their own conduct and their adherence to regulatory rules and obligations under the Insurance Act.

Thank you for the opportunity to provide our comments and we look forward to continued dialogue with FSRA to move towards a clear approach that is practical, and applicable to ensure FTC.

Please contact me with any questions you may have.

Regards,



Phil Marsillo, President and CEO
IDC Worldsource Insurance Network Inc.