



August 24, 2012

Jim Scalena  
Superintendent of Insurance  
Financial Institutions Regulation Branch  
Manitoba Finance  
Woodsworth Building  
1115- 405 Broadway  
Winnipeg, MB R3C 3L6

Dear Mr Scalena,

I am writing to thank you for meeting with Sara Gelgor and me, on August 8, 2012 to discuss implementation matters related to the *Insurance Act* revisions. CAFII offers its congratulations to you in completing the changes to the *Insurance Act*. It has been a thorough process and we appreciate the opportunity for ongoing industry consultation and input.

On behalf of CAFII we want to take this opportunity to summarize the matters discussed in our recent meeting and provide some further information.

#### Regulations and Implementation Timeframe

We understand that regulations under the *Insurance Act* will be released for industry comment this Fall and look forward to providing feedback. Upon completion of the regulations, insurers will need to implement a number of major changes to their systems and processes. Those changes cannot begin until the regulations are final and at that point the institutions must establish and resource projects to enact the necessary changes. For changes which affect the customer, communication packages need to be developed and sent to customers in advance. Staff training must also be developed, scheduled, and implemented. As noted at our meeting, these changes require sufficient preparation time to implement and we recommend that a minimum of one year be allowed for the changes to be in effect.

#### Electronic Commerce

CAFII supports allowing consumers to transact business in the channel of their choice and recommends that Manitoba harmonize with Alberta should they decide to permit electronic beneficiary designations and terminations.

Once again, thank you for meeting with CAFII. We have written to Erin Pearson regarding the issues we discussed related to the restricted license regime. Please feel free to contact CAFII as you move forward with the draft regulations.

Yours truly,

A handwritten signature in cursive script that reads "Moira Gill". The signature is written in black ink and is positioned above a horizontal line.

Moira Gill  
CAFII Representative