

COMMENT SUBMITTED VIA EMAIL BY BOURSE DE MONTREAL / MONTREAL EXCHANGE

SUBMISSION DATE: JANUARY 12, 2023

COMMENT:

Thank you for providing the opportunity to give feedback regarding the 30/30/30 rule.

To sum up, 99% of the issues all arise during the ROLL PERIODS, partially due to increased volume spike for a small time span of 2-3 days, but it is clearly exacerbated by the Point of entry via the broker.

I feel it's mostly the broker who because of speed and urgency, often neglects to put the correct clearing instructions on the trade (account type/account number, open/close for each leg of the spread) which because of the urgency to "get the fill and roll for my big client" means the back office staff is left with an impossible amount of incorrectly allocated trades, and or missing give ups and will simply never get the time to catch up before the exchange trade EOD Cut-offs hit.

If you need more feedback, do not hesitate to reach out to me.