Name of Respondent Firm: Campbell O'Connor & Co

Question	Question	Yes/ No	Comment	Paragraphs numbers referenced in your response:
1	Do you agree with the target Fund Reserves for Fund **A?**	Yes	But over a 6 year timeframe. We are of the opinion that the wrong metric is being used to identify the risk associated with the Investors Compensation Fund	20 24
2	Do you agree with the target Fund Reserves for Fund **B?**			
3	Do you support the continued placement of Excess of Loss Insurance for Fund **A?**	Yes	This is an intrinsic part of the scheme	
4	Do you support the continued placement of Excess of Loss Insurance for Fund **B?**			
5	Do you support the current borrowing arrangements?	Yes	There may be other options out there possibly via the National Pensions Board who would consider a standby facility for less than €65,000. In reality, it could take in excess of 6 months before the first payments have to released, so it's not an immediate call for cash.	

Campbell O'Connor & Co				
Question	**Question**	**Yes / No**	**Comment**	**Paragraphs numbers referenced in your response:**
6	Do you have any observations on the proposals to amend the **ICSD** as outlined in paragraph **35?**	**Yes**	An increase in compensation levels is desirable. €30k is a good start. €50k would be the objective. An ex ante fund to ring fence client instruments by firm with a reduction in annual contribution, would better demonstrate that the firm's contribution to the fund is in reality an insurance cost towards client instruments held on behalf of each client. All holdings with third party custodians should be included in this count.	**35**
7	Do you support the implementation of **Einvoicing?**	**Yes**	This should not be included as part of a strategic consultation document.	
8	Besides the current payment methods, are there other methods that you believe merit consideration?		This should not be included as part of a strategic consultation document.	

9	Do you believe the assumptions set out in paragraph 56 are reasonable? Please state your reasons.	**No**	We are of the opinion that the wrong metric is being used to identify the risk associated with the Investors Compensation Fund. The current basis of funding takes no recognition of the underlying the value of client instruments held by the individual firm– which surely is the cornerstone to the issue of liability for the ICCL fund. This assessment would be a normal basis of actuarial assessment for any insurance product. We would disagree with your assumption in paragraph 50. We would not be of the belief that our voice has been heard since the 2004 levy. The levy has risen by approx 300% in the following eight years for this firm. Paragraph 56 states that there will be "a decrease of one medium sized firm with clients year on year". Our worry is that you will be the architect of that very assumption as a result of your continual increase in premiums which are creating a disproportionate cost squeeze on contributing firms.	
10	Do you support the implementation of Proposal Al orA2?	**No**	With stronger regulation now in place, the risk of further calls on the fund diminishes. Consequently the time frame for rebuilding the fund can be relaxed. A six year period at current rates will achieve the required result.	

<table>
<tr><th>Question No.</th><th>Question</th><th>Yes No</th><th>Comment</th><th>Paragraphs numbers referenced in your response:</th></tr>
<tr><td>11</td><td>Do you believe the assumptions set out in paragraph 65 are reasonable? Please state your reasons.</td><td></td><td></td><td></td></tr>
<tr><td>12</td><td>Do you support the implementation of Proposal BI or B2?</td><td></td><td></td><td></td></tr>
<tr><td>N/A</td><td>Incorrect metric</td><td>N/A</td><td>We are of the opinion that the wrong metric is being used to identify the risk associated with the Investors Compensation Fund. The ICCL risk is correlated with the value of client instruments, not client numbers.</td><td>(Please reference the relevant paragraphs from the document)</td></tr>
<tr><td>N/A</td><td>Per client contribution is currently skewed in favour of the larger contributors.

Why is there a suggestion of a max cap when the larger contributors are getting best value per client?</td><td>N/A</td><td>Table A
Existing contribution
<table>
<tr><th>Band</th><th>Fund A € Contribution</th><th>Max No Eligible Clients</th><th>Cost Per Client €</th></tr>
<tr><td>A</td><td>12,775</td><td>9</td><td>1419.44</td></tr>
<tr><td>B</td><td>20,425</td><td>500</td><td>40.85</td></tr>
<tr><td>C</td><td>41,680</td><td>2500</td><td>16.67</td></tr>
<tr><td>D</td><td>87,505</td><td>5000</td><td>17.50</td></tr>
<tr><td>E</td><td>139,500</td><td>25000</td><td>5.58</td></tr>
<tr><td>F</td><td>146,090</td><td>50000</td><td>2.92</td></tr>
</table></td><td>(Please reference the relevant paragraphs from the document)</td></tr>
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