

MEMO# 30816

August 7, 2017

ICI Global Draft Letter to Central Bank of Ireland Regarding ETFs; Comments Due Thursday, August 10

[30816]

August 7, 2017 TO: ETF (Exchange-Traded Funds) Committee
ETF Advisory Committee

ICI Global Exchange Traded Funds Committee RE: ICI Global Draft Letter to Central Bank of Ireland Regarding ETFs; Comments Due Thursday, August 10

The Central Bank of Ireland recently published a discussion paper on exchange-traded fund that covers a wide range of topics of relevance to ETF providers, servicers, and investors.^[1] In response to an invitation to stakeholders to share their observations regarding the paper, ICI Global has drafted the attached letter, which is largely supportive of the CBI's efforts to structure the paper as an information gathering exercise that will position the CBI as a leading voice in shaping the future global regulation of ETFs.

The paper and our draft comment letter are centered around three overarching themes: investor expectations, liquidity, and the increasing popularity of ETFs. Where relevant, our letter also includes a variety of data points about Irish-domiciled ETFs. For your information, also attached is a draft of our most recent ETF publication—*Understanding the Regulation of Exchange-Traded Funds Under the Securities Exchange Act of 1934*—which will be publicly available on our website later this week.

If you have any comments on the draft letter, please send them in writing to Jane Heinrichs at jheinrichs@ici.org by **Thursday, August 10**.

Jane G. Heinrichs
Associate General Counsel

[Attachment](#)

endnotes

[1] Central Bank of Ireland, Exchange Traded Funds, Discussion Paper (2017), *available at* <https://www.centralbank.ie/docs/default-source/publications/discussion-papers/discussion-paper-6/discussion-paper-6---exchange-traded-funds.pdf?sfvrsn=6>.

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