

To whom it may concern,

We have the following comment to the "Consultation Paper on the Proposed Revisions to the Guidelines for Registered Persons Using the Internet to Collect Applications for Securities in an Initial Public Offering":

Clause 3.2.2 and 3.2.3

Requirement:

These clauses require an intermediary who offers registrant-driven ePO service to obtain the issuer's consent. Otherwise, the intermediary will be unable to offer this service.

Comments:

As stated in Clause 3.1.1, "A registrant-driven ePO differs from an issuer-driven ePO in that the issuer has little or no responsibility towards the intermediary and the need for coordinating the back-end of the ePO is absent." Since the issuer has little or no responsibility towards the intermediary offering the service, it appears to be impracticable for the issuer to assess the internal control, financial conditions, etc. of the intermediary before the issuer can give a consent to the intermediary. Therefore, the issuer's consent for registrant-driven ePO should not be required.