

From: Vic Hamilton [REDACTED]
Sent: January 17, 2019 2:38 PM
To: OBBO (FIN)
Subject: Feed back on Open Banking

Dear Sirs:

I have been practicing in the Real Estate/Financing industry since 1991. Through this time and thousands of loans arranged I have been able to gain knowledge of consumer habits and needs. This is a short form list (for brevities sake) of my comment/concerns:

1. It likely that the consumer awareness of Open Baking and it's technology would be less than 1% of the clientele I deal with. Hence where is the consumer driven need? Not perceived need but actual.

examples of data gleaned via internet search on the UK system:

* "According to a research presented by Steve Ogborn and Benedict Ireland of the Unlimited Group, 91 per cent of consumers weren't aware of open banking.

* According to a research provided by YouGov and commissioned by Challenger Bank CYBG, surveying 4,458 British adults on behalf of the Challenger Bank, only 6 per cent knew exactly the meaning of Open Banking, but over half of respondents (58 per cent) said they were simply unaware of the initiative.

2. There is no perceived need within my clientele base for more convenience or increased product offerings.

3. The threat or perceived threat of hacking, cyber-attack, etc. is the top concern among my clientele. No amount of information bombing is likely to change that perception among the vast majority of the people I deal with.

4. I see this benefitting large institutions with vast resources. Programming and expertise in this area is a very specialized and expensive to develop. Exceptional small business or those with deep pockets may be able to compete but big five will be the winners in this endeavour. I am particularly alarmed, in a Western Canadian context, as Credit Unions serve most of the provinces unique lending needs outside of large Urban centre. Their ability to effectively use API tech will lag due to internal resource limitations.

I found the literature you provided was not balanced and did not provide specific

data to support your
claims. This is uncharted water and to state "what might be" without depth and
providing a counter
argument perhaps smacks more of pro-propaganda? It is if you are being
paternalistic and don't trust
Canadians to interpret a fact and data based literature piece.

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