

Proposal: FR 4201 Market Risk Capital Rule (ICP-2019-14; Pub'd 4/9/19)

Description:

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Comment ID: 134182

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Subject: FR 4201 - Market Risk Capital Rule

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Comments:

Date: Jun 07, 2019

Proposal: Agency Information Collection [ICP-201914]

Document ID: ICP-201914

Revision: 1

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Your comment: In considerations of the OMB's rules regarding "capital market risk" one must first address the as-of-yet outstanding issues regarding the use of derivative agreements, mentioned on March 14, 2019 in R-1629 and RIN 7100-AF22 of the public comment period for the "Federal Reserve Board of Governors on Recommendations to Policy Changes Regarding Use of Derivative Contracts." Until now there has been no response on an official level to this or more than three years worth of reporting efforts on accusations that derivative agreements have been used in regards to provision of resources for people engaged via the Health and Human Services Department of the US and other social service programs, including those connected to acquisition of health insurance. Rather than focus on compliance implementation with attendant appropriate disciplinary measures being enforced, what we have seen is a continued process of "recharacterizing" allegations of fraud, waste, abuse and other forms of malfeasance into some sort of "risk" assessment that is approached and engaged in manners insufficient to the profundity of the implications of the original allegations.

This has been demonstrated several times in just the past year in the following regards:

The removal of the 10-year period for HUD deeds that instead focuses on a mere one-year "warranty" for repairs that were provided prior to the closing;

Changes in the HHS system classification of "data" to "information" and other issues concerning changes to standards regarding human test subjects in medical experimentation; and

Changes to the Centers for Medicare and Medicaid Services around categorizations of "risk as revenue" for consideration by private companies and others involved with the financialization of healthcare services and provision BEFORE and in lieu of apprising patients or service recipients of their most basic rights concerning the use of their "data" OR "information" in regards to various means by which "risk" is assessed or effectuated.

On a specifically important occasion I have discerned potential security and safety concerns regarding Form 4s for companies that issues stocks on dates of major importance to those who are in need of the sorts of protections compromised by the above-mentioned. The use of the OMB control number is one of the potential security concerns that needs to be discussed, as is the potential use of

cryptocurrencies for federal budget and/or other federal funding paradigms, especially in consideration of the lack of disclosure regarding the development of cryptocurrencies as well as how it is that their normalization is being promoted at this time with so little public information about their impact on behavioral science techniques that have been applied elsewhere. These concerns are both national in focus as well as international in focus and go to the highest levels of global emergency services provision and finance; a specific case concerns an April 20, 2018 announcement by the World Bank. What are the "reserves" that would be called upon to offset any needs for an attendant "market?" Can we get an answer to that question before we continue on this course?

Charity Colleen Crouse

2:17 pm CST

June 7, 2019