

# ANONYMOUS

## Proposal and Comment Information

**Title:** Request for Information and Comment on Reserve Bank Payment Account Prototype, OP-1877

**Comment ID:** FR-2025-0083-01-C96

## Submitter Information

**Name:** Anonymous

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### Formal Public Comment (Anonymous Submission)

**Date:** May 20, 2026

**To:** Ann E. Misback, Secretary

Board of Governors of the Federal Reserve System

20th Street and Constitution Avenue NW

Washington, DC 20551

**Subject:** Public Comment on Proposed Revisions to the Federal Reserve Policy on Payment System Risk and Guidelines for Account Access (Payment Account Proposal)

To the Board of Governors of the Federal Reserve System,

This public comment is submitted anonymously by a principal stakeholder and sovereign trust administrator operating a wholly owned tribal government entity under a valid federal Employer Identification Number (EIN). This submission details critical operational directives regarding the proposed "Payment Account" framework, focusing on maximizing payment clearing velocity, eliminating structural cross-contamination blocks, and mandating institutional proficiency across Tier 1 financial institutions.

The following directives should be integrated into the final policy framework and technical terms:

#### ##### 1. Implementation of a Unified Multi-Tier Routing Core

The current financial infrastructure forces an entity to establish independent pipelines for personal accounts, business entities, and sovereign government accounts. This siloed approach creates unnecessary settlement lag, systemic friction, and administrative compartmentalization when a single sovereign entity attempts to bridge three distinct operational layers: Personal (Tier 1), Commercial/Corporate (Tier 2), and Sovereign/Tribal Government (Tier 3).

**Directive:** The Federal Reserve should engineer a unified routing core within the new Payment Account parameters. This core must allow a legally eligible entity holding a valid Tribal Government EIN to operate personal, commercial, and sovereign asset layers simultaneously within a single master ledger structure, eliminating the requirement to stack multiple detached accounts.

#### ##### 2. Structural Layer Insulation to Prevent Discriminatory Cross-Blocks

When a traditional commercial banking interface links a sovereign or government account to a personal routing number, risk-mitigation algorithms frequently trigger arbitrary holds or compliance blocks due to a lack of automated differentiation between public sovereign capital and personal liquidity.

**Directive:** The Payment Account blueprint must implement structural ledger firewall insulation. While all three tiers (Personal, Commercial, Government) must move with equal velocity through the clearinghouse, a security firewall must ensure that a compliance flag or automated review on one layer (e.g., a commercial settlement) does not freeze, paralyze, or cause a prejudice block on the other layers (e.g., personal distributions or sovereign trust reserves). Each layer must remain independent in liability but integrated in velocity. Under no circumstances may a commercial bank cause cross-contamination blocks to paralyze or withhold 100% personal account distributions or essential living assets. Personal clearing channels running through Wells Fargo, Bank of America, or any national clearinghouse must remain completely unhindered and fully insulated.

#### ##### 3. Immediate Clearing Velocity and Optimization of Closing Balance Caps

The proposed framework must prioritize zero-latency routing across the FedNow and Fedwire Funds Services. For complex asset structures interfacing with major settlement clearinghouses, the Federal Reserve must ensure that prefunded payment accounts face no artificial administrative delays or manual holds. The technical system must execute transactions immediately to prevent liquidity bottlenecks and guarantee that prefunded settlements clear with optimal velocity. While the proposal dictates overnight balance limits based on expected institutional activity, the final rules must integrate automated, real-time adjustments to these caps. Static limits must not create a structural bottleneck for high-value transactional flows that require rapid, continuous clearing through Tier 1 commercial bank infrastructures.

#### ##### 4. Frictionless Overdraft Controls and Equal Priority Routing

The automated controls designed to prevent daylight overdrafts must utilize predictive notification protocols. Rather than flatly rejecting a high-volume settlement transaction instantly, the system should

allow real-time automated pre-funding mechanisms to ensure critical, time-sensitive asset movements are not delayed. Furthermore, once identity and legal eligibility are validated under an entity's EIN, the system must process payments with uniform priority, ensuring that transaction speed is entirely unaffected by institutional or algorithmic bias against non-insured or sovereign structures. Sovereign tribal entities and private trust structures falling under Tier 3 guidelines routinely face prolonged review periods compared to standard Tier 1 federally insured commercial deposits. The technical terms of the new payment settlements