ANONYMOUS

Proposal and Comment Information

Title: Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-weighted Assets, R-1888

Comment ID: FR-2026-0008-01-C139

Submitter Information

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Submitted Date: 05/09/2026

I strongly oppose assigning Bitcoin a 1,250% risk weight under the Basel cryptoasset framework. This punitive treatment is a category error that treats the world's most transparent, issuerless digital commodity like the riskiest securitization tranches.

Bitcoin has no issuer, no borrower, and no counterparty risk. Its price volatility, liquidity, custody, and operational risks are measurable, hedgeable, and already addressed by existing market-risk (FRTB) and operational-risk rules. Unlike opaque or illiquid assets, Bitcoin trades on deep, global markets 24/7 with a public ledger.

A 1,250% weight (effectively 100% capital requirement) makes it economically impossible for U.S. banks to custody, lend against, or offer Bitcoin services to customers. This forces activity into less-regulated venues, reduces customer protection, harms U.S. competitiveness, and blocks banks from a legitimate asset class that millions of Americans already hold.

Gold and U.S. Treasuries receive 0% risk weights. Bitcoin deserves risk-sensitive treatment as a "non-issuer digital commodity" — not a blanket ban by capital rule.

I urge the Federal Reserve, OCC, and FDIC to reject the 1,250% default and adopt a tailored, risk-based approach that allows safe, regulated bank participation in Bitcoin.

Thank you for considering this comment.