STRIVE, INC., JEFF WALTON

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-C221

Submitter Information

Organization Name: Strive, Inc.

Organization Type: Company

Name: Jeff Walton

Submitted Date: 06/18/2026

Strive, Inc. respectfully submits the attached comment letter regarding the above-referenced proposal, R-1888. The letter also addresses the related proposal, R-1887, as noted therein.

Strive, Inc.

June 18, 2026

Via Electronic Submission

Board of Governors of the Federal Reserve System
Office of the Comptroller of the Currency
Federal Deposit Insurance Corporation

Re: Regulatory Capital Rule: Category I and II Banking Organizations, Banking Organizations With Significant Trading Activity, and Optional Adoption for Other Banking Organizations; Docket ID OCC-2026-0265; Docket No. R-1887; RINs 1557-AF52, 7100-AH20, 3064-AF29; and Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-Weighted Assets; Docket ID OCC-2026-0034; Docket No. R-1888; RINs 1557-AF49, 7100-AH21, 3064-AG23

Strive, Inc. ("Strive") respectfully submits this comment on the above-referenced proposals.[1] Strive supports regulatory capital rules that are risk-sensitive, technology-neutral, and grounded in the legal and economic substance of an exposure.

Strive has a direct interest in these issues. Strive is a publicly traded company that holds a Bitcoin treasury and has issued securities in connection with that strategy, including its perpetual preferred stock trading under ticker SATA, a member of an emerging category of fixed income-like instruments often referred to as digital credit. Strive and its affiliates also participate in markets for registered investment products, swaps, preferred and hybrid corporate securities, and other digital-asset-related instruments. Strive is not asking the Agencies to adopt security-specific capital treatment for SATA or for any other particular instrument. Rather, Strive urges the Agencies to preserve a risk-sensitive, instrument-level approach under which capital treatment turns on the legal rights, contractual seniority, cash-flow structure, liquidity, trading-book or banking-book use, and empirical risk characteristics of the exposure—not on a broad label attached to the issuer's treasury strategy or digital-asset affiliation.

This comment responds principally to R-1887 Questions 1, 81–83, 102, and 119–120, and to R-1888 Questions 26–34 and 36–38.

I. The final rules should not silently import or prejudge Basel crypto asset treatment

Responsive to R-1887 Question 1.

R-1887 Question 1 asks about the interaction between the proposal and other existing rules and notices of proposed rulemaking. Strive respectfully urges the Agencies to clarify that these

[1] See Regulatory Capital Rule: Category I and II Banking Organizations, Banking Organizations With Significant Trading Activity, and Optional Adoption for Other Banking Organizations, 91 Fed. Reg. 14,952 (Mar. 27, 2026); Regulatory Capital Rules: Regulatory Capital and Standardized Approach for Risk-Weighted Assets, 91 Fed. Reg. 15,332 (Mar. 27, 2026).

proposals do not adopt, incorporate, or prejudge any treatment under the Basel Committee's separate cryptoasset standard.[2]

The present proposals address the general bank regulatory capital framework. They do not expressly propose comprehensive capital treatment for Bitcoin, digital assets, digital-asset-linked corporate securities, tokenized credit instruments, collateralized digital-asset transactions, or dealer hedges of such exposures. If the Agencies intend to address those issues, they should do so through a dedicated notice-and-comment process and on an exposure-by-exposure basis.

That clarification is important because digital-asset-related exposures can arise in many forms: custody, spot holdings, secured lending, derivatives, preferred and hybrid corporate securities, collateralized transactions, securitizations, and dealer hedges. Those activities present different credit, market, operational, liquidity, legal, and counterparty risks. The final rules should not be read to resolve those issues by implication.

II. The Agencies' technology-neutral treatment of tokenized securities should guide related digital-asset questions

Responsive to R-1887 Question 1 and R-1888 Questions 26–30.

The Agencies formalized this technology-neutral principle most recently in the Interagency FAQs on Tokenized Securities issued on March 5, 2026 (OCC Bulletin 2026-7). Those FAQs confirm that (i) the capital rule is technology neutral; (ii) an eligible tokenized security should receive the same capital treatment as its non-tokenized equivalent; (iii) derivatives referencing eligible tokenized securities should be treated like derivatives referencing the non-tokenized form; and (iv) the capital rule does not provide different treatment based on whether an instrument uses a permissioned or permissionless blockchain.[3]

Strive respectfully urges the Agencies to reaffirm in any final rule that the same technology-neutral principle governs digital-asset-related corporate securities, dealer hedges, collateral arrangements, and future digital credit structures, and that capital treatment follows the legal rights and economic risks of the exposure, not its technological form, settlement method, or digital-asset adjacency.

---

[2] See Basel Committee on Banking Supervision, Prudential Treatment of Cryptoasset Exposures (Dec. 2022), https://www.bis.org/bcbs/publ/d545.htm; Basel Committee on Banking Supervision, Cryptoasset Standard Amendments (July 2024), https://www.bis.org/bcbs/publ/d579.htm; Basel Framework, SCO60: Cryptoasset Exposures, https://www.bis.org/basel_framework/chapter/SCO/60.htm.

[3] See Office of the Comptroller of the Currency, OCC Bulletin 2026-7, Regulatory Capital: Interagency FAQs on Tokenized Securities (Mar. 5, 2026), https://www.occ.gov/news-issuances/bulletins/2026/bulletin-2026-7.html; Board of Governors of the Federal Reserve System, Capital Treatment of Tokenized Securities Frequently Asked Questions (Mar. 5, 2026), https://www.federalreserve.gov/supervisionreg/capital-treatment-of-tokenized-securities-faqs.htm.

III. Digital-asset-related exposures should be analyzed exposure by exposure

Responsive to R-1887 Questions 1, 81–83, 102, and 117–120; R-1888 Questions 26–34 and 36–38.

Digital-asset-related activity is not monolithic. The Agencies should therefore avoid categorical treatment based on terms such as "crypto," "Bitcoin treasury," or "digital asset." Instead, the Agencies should evaluate exposures under the capital framework that corresponds to the actual risk channel: credit risk, market risk, operational risk, counterparty credit risk, credit-risk mitigation, or securitization, as applicable.

This approach is consistent with the proposals' requests for comment. R-1887 Questions 81–83 ask whether certain equity exposures have risk profiles different from general equity exposures and whether different treatment may be appropriate. R-1887 Question 102 asks about the definition of market risk covered position, while Questions 119–120 ask about the sensitivities-based method and recognition of diversification in market-risk capital. R-1888 Questions 26–34 address credit-risk mitigation, collateral valuation, haircuts, and prepaid credit protection, while Questions 36–38 address securitization definitions and treatment.[4]

IV. Preferred and hybrid securities should be evaluated by their legal and economic features, not by the issuer's treasury strategy

Responsive to R-1887 Questions 81–83 and 102.

Certain issuers, including Strive, have issued preferred and hybrid securities in connection with a Bitcoin treasury strategy. Such instruments may carry defined contractual terms, including priority over common equity, stated liquidation preferences, formula-based distributions, redemption or call features, and other rights set forth in the governing documents. They are economically and legally distinct from a direct spot holding of the underlying digital asset. A holder owns a claim against the issuer; the holder does not own Bitcoin.

Accordingly, such instruments should be classified and capitalized according to their actual legal and economic features—as preferred, hybrid, equity, subordinated corporate, trading-book, or other exposures as applicable under the capital rule—and should not be recharacterized as direct cryptoasset exposures solely because the issuer holds Bitcoin as part of its treasury strategy. Strive does not suggest that these instruments are risk-free or that their risks should be understated. To the contrary, their risks should be measured directly, including by reference to contractual seniority, liquidation preference, dividend or coupon mechanics, cumulative or non-cumulative features, call or redemption terms, market liquidity, volatility, issuer creditworthiness, and correlation to the issuer's common equity and treasury assets. But that analysis should be instrument-specific. A preferred or hybrid security should not automatically be treated as equivalent to the issuer's common stock or as a direct digital asset exposure.

---

[4] See R-1887, 91 Fed. Reg. at 14,957 (Question 1), 15,008 (Questions 81-83), 15,026 (Question 102), 15,031 (Question 117), 15,034 (Question 118), 15,038 (Questions 119-120); R-1888, 91 Fed. Reg. at 15,347-52 (Questions 26-34), 15,354-55 (Questions 36-38).

For that reason, Strive supports retaining the proposed 100 percent treatment for non-significant equity exposures and urges the Agencies not to impose bespoke higher treatment for preferred or hybrid corporate securities based solely on issuer labels, absent a clear evidentiary record.

V. Dealer hedges and digital credit market infrastructure should be treated under the frameworks that measure their actual risks

Responsive to R-1887 Questions 102 and 117–120; R-1888 Questions 26–34 and 36–38.

Capital treatment also affects market infrastructure. Regulated funds and other market participants may obtain exposure to preferred digital credit instruments through swaps or similar derivatives. Dealers may hedge those transactions by holding the relevant reference securities or related instruments. Capital treatment for those hedge positions can directly affect pricing, capacity, margin terms, and market liquidity.

The Agencies should avoid rules or interpretations that penalize bona fide hedging or market-making activity merely because the reference issuer has a digital asset treasury strategy. If a dealer holds a hedge in the trading book, the position should be evaluated under the applicable market-risk framework, including the relevant rules for market risk covered positions, trading-desk treatment, risk-factor mapping, liquidity, diversification, and hedging. If the exposure is collateralized, the relevant issues should be enforceability, valuation, liquidity, margining, custody, and appropriate haircuts. If the exposure is securitized or otherwise tranched, the relevant issues should be risk transfer, look-through analysis, payment priority, underlying exposure quality, and operational requirements.

To be clear, Strive is not asking the Agencies in this rulemaking to add any particular digital asset or related instrument to the list of eligible collateral, or to adopt a new securitization framework for digital credit assets. Strive asks only that, to the extent such exposures satisfy the relevant legal, enforceability, valuation, margining, liquidity, and risk-transfer requirements under existing or future capital rules, they be evaluated under those frameworks on a risk-sensitive basis rather than disfavored because of digital asset affiliation.

Conclusion

Strive respectfully urges the Agencies to confirm in any final rule that these proposals do not adopt, incorporate, or prejudge any future cryptoasset capital framework. If and when the Agencies address Bitcoin, digital assets, digital-asset-linked corporate securities, tokenized credit, collateralized digital-asset transactions, or dealer hedges, they should do so through a dedicated notice-and-comment process that evaluates each exposure according to its actual legal and economic characteristics. That approach would support safety and soundness, preserve risk sensitivity, and avoid unnecessary migration of digital-asset-related activity outside supervised financial markets.

Respectfully submitted,
Jeff Walton
Chief Risk Officer, Strive, Inc.