

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-C99

Submitter Information

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Submitted Date: 05/08/2026

Assigning Bitcoin a 1,250% risk weight under Basel is a fundamental category error.

Bitcoin is not a corporate security, a loan, or a leveraged credit product. It has no issuer, no counterparty risk, and operates on the most transparent monetary network in the world.

Its real risks — volatility, custody, liquidity, and operations — can already be managed through existing market and operational risk frameworks. A blanket 1,250% treatment is effectively a prohibition on regulated bank participation.

This policy would not reduce Bitcoin adoption. It would simply push activity away from regulated banks and into less-regulated environments, weakening consumer protection and harming U.S. competitiveness in digital assets.

Bitcoin should be treated as a non-issuer digital commodity under a risk-sensitive framework — not as the highest-risk asset in the financial system.

I urge the Federal Reserve, OCC, and FDIC to adopt a tailored approach that allows safe and regulated bank participation in Bitcoin.