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Proposal and Comment Information

Title: Proposed Third-Party Risk Management Guide for Traditional Community Banking Organizations, OP-1880

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Submitter Information

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Organization Type: Company

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Subject: Comment on Proposed Third-Party Risk Management Guidance

Thanks for the opportunity to comment on the proposed third-party risk management guidance. I offer this perspective as someone with more than twenty-eight years in the financial industry, including more than twenty-one years specializing in payments systems, messaging, and high-integrity transaction flows. My work has focused on the practical realities of how money moves, how systems fail, and how correctness is preserved or lost in real-world financial infrastructure.

I have developed a comprehensive framework of new technologies that introduce several correctness-preserving constructs, including Correctness Preserving Monetary Theory (CPMT), Correctness Preserving Financial Instruments (CPFI), the Correctness Preserving Transfer Layer (CPTL), and Correctness Preserving Monetary eXchange (CPMX). These constructs address long-standing structural weaknesses in traditional fiat systems, digital payments, stablecoins, and crypto-asset ecosystems.

The central property of this framework is that every monetary instrument carries complete, non-fungible lineage from its creation to its retirement. Every transfer is correctness-preserving, every state transition is verifiable, and every instrument retains its semantics across all system boundaries. Under this model:

- * Fraud based on duplication, synthetic instruments, or ledger inconsistencies becomes structurally impossible.
- * Laundering within the system cannot occur, because monetary objects cannot shed or obscure their lineage.
- * Policy constraints can be applied directly to monetary instruments without compromising privacy or fungibility outside the intended policy domain.
- * The system can verify the entire history of any instrument without relying on attestation, trust, or opaque external behavior.

These properties represent a CATEGORY SHIFT. They do not improve third-party risk management. They eliminate the architectural conditions that create third-party risk in the first place. Today, institutions must rely on external systems whose correctness cannot be independently verified. CPMT, CPFI, CPTL, and CPMX remove that dependency by ensuring that correctness is provable at every boundary.

Instead of managing risks associated with unverifiable external systems, institutions can require correctness-preserving participation. This shifts supervisory focus from mitigating risk to verifying compliance through structural and cryptographic guarantees.

Additional information, including detailed explanations of CPMT, CPFI, CPTL, CPMX, and other related technologies is available at my website:
<https://www.zerotrusteventsystems.com>

Thank you for your consideration.

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