

CERTISYN, INC., JOEL HILLIER

Proposal and Comment Information

Title: Implementing the Federal Reserve Board's Responsibilities under the GENIUS Act, R-1899

Comment ID: FR-2026-0033-01-C18

Submitter Information

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Organization Type: Company

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Certisyn, Inc. submits the attached comments on the Board's proposed rule, Implementing the Federal Reserve Board's Responsibilities Under the GENIUS Act, 91 FR 61580, Docket R-1899, RIN 7100-AH29.

Issue: the denominator of the one-to-one requirement. Proposed 12 CFR 247.11 specifies the reserves in detail. The outstanding issuance value, defined as the total consolidated par value of outstanding payment stablecoins, appears in the monthly composition report as a single total, and the report leaves the population behind it, the units excluded and the units not determined unstated. Section 247.11(d)(1) asks for a "number" of outstanding payment stablecoins while the definition measures par value.

Recommendation: describe in the preamble to the final rule a Reserve Coverage Record of 6 elements (D1 to D6): declared population, definition mapping, itemized not-determined units, reconciliation and coverage, independence, and integrity and replay. The record is non-exclusive evidence for the report and the examination under 247.11(e). The one-to-one requirement, the officer certification and the examination stay as proposed.

Questions addressed: 14, 50, 51, 83, 84, 85, 86.

The recommendation is technology neutral: any party that produces the 6 elements satisfies it. Certisyn discloses a commercial interest in how verification evidence is specified, issues no payment stablecoins and holds no reserve assets.

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DOCKET R-1899 · RIN 7100-AH29

Comments on Implementing the Federal Reserve Board's Responsibilities Under the GENIUS Act

A Reserve Coverage Record for the denominator of the one-to-one requirement in proposed 12 CFR 247.11.

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ISSUED TO	Board of Governors of the Federal Reserve System
VERSION AND DATE	1.0 · October 2026
CLASSIFICATION	PUBLIC · Submitted for the public record
PURPOSE	Comment on the proposed rule published at 91 FR 61580 (29 September 2026), addressing Questions 14, 50, 51, 83, 84, 85 and 86.
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Executive summary

Certisyn, Inc. submits these comments on the Board's proposed rule, Implementing the Federal Reserve Board's Responsibilities Under the GENIUS Act, 91 FR 61580, Docket R-1899, RIN 7100-AH29. The comments address 1 issue that runs through Questions 14, 50, 51, 83, 84, 85 and 86: the denominator of the one-to-one requirement. A reserve ratio is a numerator over a denominator, and the proposed rule specifies the numerator in detail.

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rows in the proposed Table 1 template describe the outstanding payment stablecoins, which form the denominator	proposed requirement, § 247.11(e)(1), that an accounting firm examine the report, with the scope of the examination left open	elements in the recommended Reserve Coverage Record

Proposed § 247.11 requires a Board-supervised PPSI to hold reserve assets whose fair value equals or exceeds the outstanding issuance value at all times. The monthly composition report in § 247.11(d) shows the amount and composition of reserves in 13 template rows, and the examination in § 247.11(e)(1) and the certification in § 247.11(e)(2) attach to that report. The outstanding issuance value, which the definition sets as "the total consolidated par value of all of a permitted payment stablecoin issuer's outstanding payment stablecoins," appears in the report as a single total. Certisyn recommends that the Board describe, in the preamble to the final rule, a Reserve Coverage Record that states the population behind that total, the units excluded and why, and a reconciliation of supply to the issuer's books at the same instant as the reserves. The record has 6 elements, and the same record form serves the reserve side. A coverage statement on both sides of the ratio lets an examiner, a certifying officer and a reader of the public report check the same figure.

STRATEGIC PRINCIPLE

A one-to-one ratio is only as checkable as its denominator. The report that states the denominator also states its population, its exclusions and its as-of instant, and a reviewer who has never met the issuer can recompute it.

REF	ELEMENT OF THE RECORD	QUESTIONS
D1	Declared population: the ledgers, networks and stablecoin classes in scope, and the as-of instant shared with the reserves	14, 85
D2	Definition mapping: the units counted as outstanding under the definition, and the units excluded, by reason class	14
D3	Not determined: units whose status was not established, itemized with a reason, and never counted as excluded	14, 84
D4	Reconciliation and coverage: supply reconciled to the issuer's books, and reserve custody locations examined against those declared	50, 83, 86

D5	Independence: who examined the record and their relationship to the issuer	51, 84
D6	Integrity and replay: tamper-evident, independently time-stamped, recomputable from the record	50, 51

SUBMISSION	Certisyn, Inc.
DOCKET	R-1899
RIN	7100-AH29
RULE	Implementing the Federal Reserve Board's Responsibilities Under the GENIUS Act, 91 FR 61580
PROVISIONS ADDRESSED	12 CFR 247.11(a), 247.11(d), 247.11(e), Table 1 to 247.11(d), definition of outstanding issuance value
QUESTIONS ADDRESSED	14, 50, 51, 83, 84, 85, 86
RECOMMENDATIONS	D1 to D6, Reserve Coverage Record
INSTRUMENT REQUESTED	Preamble guidance to the final rule, leaving the regulatory text as proposed

1. Interest and disclosure

Certisyn, Inc. is a Delaware corporation. Certisyn™ builds verification infrastructure. Certisyn verifies claims made by entities and produces sealed determinations that a third party can recheck without the claimant's cooperation. Certisyn issues no payment stablecoins and holds no reserve assets. Certisyn has a commercial interest in how verification evidence is specified, and any party that produces records of the stated description satisfies the recommendations below.

Certisyn has published 6 individual Internet-Drafts at the IETF datatracker. They are individual submissions. The Coverage Attestation Profile, draft-hillier-coverage-attestation-00, posted 20 August 2026, gives a tool-agnostic vocabulary for what an examination covered, what it did not, and why, with declared populations and denominators. The Attestation Reconciliation Protocol, draft-hillier-scitt-arp-04, posted 8 September 2026, covers policy-versioned sealing and reconciliation. The other 4 are listed in Section 6.

2. What the proposed rule says about the denominator

The definition in proposed § 247.1 reads:

Outstanding issuance value	"Outstanding issuance value means the total consolidated par value of all of a permitted payment stablecoin issuer's outstanding payment stablecoins."
§ 247.11(a)(2)	"record the fair value of reserve assets required under paragraph (a)(1) of this section at a minimum of once each calendar day at 5:00 p.m."
§ 247.11(d)(1)	"the total number of outstanding payment stablecoins issued by the Board-supervised PPSI;"
§ 247.11(e)(1)	"The report required under paragraph (d) of this section must have been examined by a registered public accounting firm prior to publication."

§ 247.11(e)(2)

“The Chief Executive Officer and Chief Financial Officer (or the persons performing the equivalent functions) of a Board-supervised PPSI must submit a certification as to the accuracy of each monthly report required under paragraph (d) of this section to the Board.”

The preamble adds that a digital asset minted by a PPSI “would not be included in the calculation of outstanding issuance value” until the obligation to convert, redeem, or repurchase it is incurred, and that a burned payment stablecoin ceases to be included. The Board asks in Question 14 whether the definition should reach the par value of non-consolidated affiliates, and in Question 50 whether the one-to-one comparison should be tested daily. Questions 83 to 86 ask what the composition report should contain, including custody location, custodian names and white label arrangements.

3 observations follow from the text. The definition measures par value, while § 247.11(d)(1) asks for a “number” of outstanding payment stablecoins, and Table 1 to § 247.11(d), at 91 FR 61672, shows the amounts in thousands of U.S. dollars. The report states a single total, and the units it includes, excludes or could not classify are left to the reader. The examination in § 247.11(e)(1) attaches to the report, and the proposed text leaves the scope of that examination open. A supervisor who reads a monthly report in a later period needs to know what population the denominator was drawn from, which units the issuer treated as outside it, and which units it could not classify.

3. Recommendations

Certisyn recommends that the Board describe the Reserve Coverage Record in the preamble to the final rule as a non-exclusive way to support the report and the examination under § 247.11(e). The certification by the Chief Executive Officer and Chief Financial Officer remains theirs, and the record is the evidence on which they certify.

D1 Declared population

The record names the ledgers, networks and classes of payment stablecoin within its scope and gives the as-of instant. The instant is the one at which the reserves are stated, so the numerator and the denominator describe a single moment. Question 85 asks about issuers that issue multiple stablecoins under different brands, and a declared population states each class in scope.

Questions 14, 85

D2 Definition mapping

The record states how many units were counted as outstanding under the definition, and how many were excluded, with a reason class for each exclusion. The preamble's 2 examples, a digital asset minted without a redemption obligation and a payment stablecoin removed from circulation, are reason classes. Question 14 asks about affiliates, and an affiliate's units are either in the declared population or listed as a reason class.

Question 14

D3 Not determined

A unit whose status could not be established is recorded as not determined, with a reason. That state is distinct from counted and from excluded, so an unresolved unit is never absorbed into an exclusion. The count of not-determined units gives the report a measure of its own coverage.

Questions 14, 84

D4 Reconciliation and coverage

The record reconciles the counted units to the issuer's books and states any difference. On the reserve side it applies the same form to custody: the locations and custodians declared, the number examined, and the number not examined with reasons. Questions 83 and 86 ask what the report should say about custody location and custodian names, and a coverage statement answers both with a denominator.

Questions 50, 83, 86

D5 Independence

The record states who examined it and the relationship between that party and the issuer, with a conflicts statement. Section 247.11(e)(1) already requires a registered public accounting firm, and the record makes the scope of its examination readable against the same 6 elements.

Questions 51, 84

D6 Integrity and replay

The record is tamper-evident through a cryptographic hash, carries a time-stamp from a party other than the issuer, and can be recomputed: a reviewer derives every stated figure from the record and its cited inputs without the issuer's cooperation. Question 51 asks about protections against fraud or misuse of reserve assets, and a sealed record fixes what the issuer's books showed on the date.

Questions 50, 51

4. Fit with the proposed rule

Technology neutral. The record describes content. Any issuer, accounting firm or technology provider that produces the 6 elements satisfies the description, and any vendor, format or license class may produce it.

Statute and certification preserved. The one-to-one requirement, the monthly report, the examination and the officer certification stay as proposed. The record documents what supported each figure.

Alignment of terms. The recommended record begins from the defined term, par value of outstanding payment stablecoins, and states the unit of the report. The same wording in § 247.11(d)(1) and in the definition removes a point on which 2 issuers could read the report differently.

Supervisory analytics. Records with a declared population and an itemized residual let the Board and the other agencies compare issuers on a common basis. 2 figures follow from any conforming record: the reconciliation difference, and the not-determined share of the declared population. Both are computable by anyone who holds the record, including automated review tools.

Consistency across regulators. Several of the Board's questions are marked as similar to OCC questions. A record described once serves a PPSI supervised by any of the primary Federal payment stablecoin regulators.

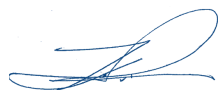
5. Scope of the record

The record states what was counted, what was excluded and what was not determined. The judgments on sufficiency of reserves, on the one-to-one requirement and on enforcement belong to the Board and the other regulators. The record supplies the facts on which those judgments are made.

6. Submission particulars

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Best,



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