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Implementing the Guiding and Establishing National Innovation for U.S. Stablecoins Act for the Issuance of Stablecoins by Entities Subject to the Jurisdiction of the Office of the Comptroller of the Currency

Comment On: OCC-2025-0372-0001
Guiding and Establishing National Innovation for U.S. Stablecoins Act for the Issuance of Stablecoins by Entities Subject to the Jurisdiction of the Office of the Comptroller of the Currency

Document: OCC-2025-0372-0034
B2BTechnique

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General Comment

See attached file(s)

Attachments

B2BTechnique

RE: Implementing the Guiding and Establishing National Innovation for U.S. Stablecoins Act for the Issuance of Stablecoins by Entities Subject to the Jurisdiction of the Office of the Comptroller of the Currency

Docket ID: OCC-2025-0372

Date: March 28, 2026

My name is Brandon Smith. I am the founder of B2BTechnique, a financial technology company developing compliance infrastructure software specifically for permitted payment stablecoin issuers under the GENIUS Act. Our website is B2BTechnique.com.

I am submitting this comment to express support for Option A of proposed Section 15.11(c) and to offer the perspective of a compliance technology developer building tools to help issuers meet the requirements of this proposed rule.

SECTION 1 -- ON THE SAFE HARBOR STRUCTURE

The quantitative safe harbor in proposed Section 15.11(c)(2) -- requiring at least 10 percent daily liquidity, at least 30 percent weekly liquidity, no more than 40 percent concentration at any single eligible financial institution, and a weighted average maturity of no more than 20 days -- provides the standardized, measurable targets that permitted payment stablecoin issuers need to build compliant reserve management systems.

As a developer building software to automate this compliance workflow, I strongly support Option A and urge the OCC to finalize it substantially as proposed. Standardized quantitative thresholds enable issuers to implement automated monitoring and generate the audit trails that registered public accounting firms will need to conduct monthly examinations under proposed Section 15.11(f)(1). Option B, which relies on a principles-based approach without specific quantitative thresholds, would create significant uncertainty for both issuers and the compliance technology providers building systems to support them.

SECTION 2 -- ON STANDARDIZED MONTHLY DISCLOSURE FORMAT

I respectfully request that the OCC prescribe a standardized data format for the monthly reserve composition report required under proposed Section 15.11(e).

A standardized format would reduce compliance costs for issuers, facilitate consistent examination by registered public accounting firms, and improve the quality of public data available to market participants and researchers. Without a standardized format, each issuer will independently develop its own reporting structure. This creates unnecessary burden for examiners reviewing reports across multiple issuers and reduces the comparability of public disclosures across the industry. A standardized format would benefit issuers, examiners, accounting firms, and the public equally.

SECTION 3 -- ON THE WEIGHTED AVERAGE MATURITY DEFINITION

The proposed rule invites comment on whether the OCC should adopt the same weighted average maturity definition used in SEC Rule 2a-7, including maturity assumptions for certain instruments based on interest rate reset dates or demand repayment options rather than final maturity dates.

I support adopting a clear, express definition of weighted average maturity in the final rule, consistent with the time remaining until repayment of principal as described in the proposed rule. The OCC's stated expectation that maturity of reserve assets will be the time remaining until repayment of principal is the correct approach for the limited range of permissible reserve assets under Section 15.11(b). A clear, codified definition in the final rule will enable compliance software to calculate weighted average maturity consistently across all issuers, reducing ambiguity for both issuers and examiners and eliminating the risk of inconsistent interpretation across institutions.

SECTION 4 -- ON NOTIFICATION REQUIREMENTS FOR RESERVE SHORTFALLS

The proposed Section 15.11(g)(1) requires issuers to notify the OCC through its appropriate supervisory office on any day their reserve asset amount falls below the required minimum. This is an operationally critical provision.

I respectfully request that the OCC specify the exact notification format, submission method, and timing window for this notification in the final rule. For example, the OCC should clarify whether notification must occur before the close of business on the day the shortfall is identified, whether notification must be submitted through a specific portal or supervisory channel, and what minimum information must be included in the notification. Clear operational specifications will allow compliance systems to automate this notification process and will reduce the risk of inadvertent procedural violations by issuers who are otherwise in good faith attempting to remediate a reserve shortfall.

SECTION 5 -- ON THE EXAMINATION CYCLE FOR SMALLER ISSUERS

The proposed 18 to 36 month examination cycle for qualifying smaller issuers under proposed Section 15.14(d) -- applying to issuers with an outstanding issuance value of less than $1 billion or less than $25 billion in total monthly trading volume -- is appropriate and proportionate.

This provision will encourage new entrants into the permitted payment stablecoin issuer market by reducing the regulatory burden on smaller and less complex institutions that are in full compliance with reserve and reporting requirements. I support this provision as proposed and encourage the OCC to preserve it in the final rule.

CONCLUSION

The OCC's proposed implementing regulations for the GENIUS Act represent a thoughtful and workable framework for the supervised issuance of payment stablecoins. The standardized, quantitative approach of Option A under Section 15.11(c)(2) will enable issuers, examiners, accounting firms, and compliance technology providers to build consistent, reliable systems around clear regulatory expectations. I urge the OCC to finalize the rule substantially as proposed, with the additions of a standardized monthly disclosure format, an express weighted average maturity definition, and clear operational specifications for reserve shortfall notifications.

I appreciate the OCC's work in developing these implementing regulations and the opportunity to participate in this public comment process.

Respectfully submitted,

Brandon Smith

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March 28, 2026