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Mr. Lawsky et al;

I'm concerned that the recent proposed regulations on virtual currency could adversely affect time banks and other "local currency" initiatives. Time banks, especially, should be exempt from the virtual currency regulations since the "currency" generated through service or skills exchange is not exchangeable for cash, and operates under different tax rules. Having just launched a time-bank service to support social enterprise in NYC (goodnikels.com) I feel that these regulations would create an administrative burden that would be difficult for many organizations (like mine) to handle.

I would like to submit this comment formally, but I find no link to the official comment protocol. Please include that on the website or send it to me personally so that I can submit this comment officially.

Thanks,  
Nate Heasley, J.D.  
Founder/Director Goodnik.org

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