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Dear Superintendent Lawsky and General Counsel Syracuse,

The proposed "BitLicense" framework threatens the privacy of virtual currency users, innovators, and researchers.

I urge you to engage with civil society to create a new framework that does not erode consumer privacy, does not restrict research or experimentation with cryptographic currency, and is based in respect -- not fear -- of the potential of cryptographic currency.

Channeled smartly, Bitcoin and other cryptographic currencies could create a landscape favorable to consumer privacy and appropriate regulation -- all without the need for large financial institutions acting as middle men. New York, as the home of the country's financial epicenter, has a unique opportunity to lead the nation on creating a regulatory environment friendly to innovation and ordinary consumers.

I share civil society's concerns with the current proposal:

1. The BitLicense is extremely broad, requiring licenses for far more than just money services.
2. It infringes on the privacy rights of individual users. Companies that obtain a BitLicense could be forced to collect identifying data on account holders and end users including full name and physical address. This information will be kept on file for 10 years in case the government seeks it. So while individual users may not need a BitLicense, their privacy will be seriously affected.

3. It forces virtual currency innovators to undergo rigorous background checks and submit fingerprints to state and federal law enforcement. This will create a barrier to entry for startups and inventors looking to create new services.

Thank you for taking my comments into consideration.

Sincerely,
Eric Mill