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Dear Superintendent Lawsky and General Counsel Syracuse,

I am writing to you today to express my concerns regarding the proposed "BitLicense" legislation/framework. As a dedicated security and privacy professional with nearly a decade of experience working in the industry, I agree with several reservations penned by the Electronic Frontier Foundation.

The framework is excessively broad and has the posturing to infringe on the privacy rights of its user base. 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.

DFS should respect the privacy of technology users, and limit its regulation to what is proportionate to the real threat at hand.

Sincerely,

David A. Scovetta (CISSP, CIPP)  
New York