

1871

-----BEGIN PGP SIGNED MESSAGE-----

Hash: SHA1

Dear Superintendent Lawsby and General Counsel Syracuse,

I'm writing you today to express my deep concerns about the "BitLicense" proposal. The current framework threatens the privacy of virtual currency users, innovators, and researchers. In particular:

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 start ups and inventors looking to create new services.
4. The proposal as written raises First Amendment concerns.

It's premature to craft regulations for an industry that's so new and still in flux. Bitcoin and similar virtual currencies are still in their infancy, and we don't yet know what new tools and services might be created. This regulatory proposal could cut that innovation off at the knees, before we have a chance to see the potential societal benefits.

The NY DFS is letting the fear of money laundering drive a massive regulatory proposal forward that would affect users who are doing nothing wrong. NY DFS should respect the privacy of technology users, and limit its regulation to what is proportionate to the real threat at hand.

Sincerely,

Gabriel

-----BEGIN PGP SIGNATURE-----

Version: GnuPG v1

iQIcBAEBAgAGBQJUQgbFAAoJEPfCrpArKeZoH60QAKUVRZtBiKrwDw6dnHPfrF2D
B/EWQPbj57nGCxoOGxuQx6VuFkt/wdNjW0i2YaxcGJ17dhRvqp7m1HR4fiKzTYXa
9yy+lyE/ikQ4rXFQTBpujM5cq3KAL4kukVAiiwfl18pkV1x3L46Ct5VLL94F7FI
kKLhPY+yS4xQL3mlhLv3v1w0dYxUSuLTBRhOk/M6VVi2HFc3GUcxCXRFy2bHDXkl
iBUcZszMKFKbvsHCqr+ImtAonKJhbOKJncU57uZef8po3a50YHNpW9I3v9td/9F1
KASZZwyMAxUZppa/NvV1ENkKveOlozScyz26VKOK3kghMts6negc4+VymJmd/UyM
9G8v/NwzKgOuTnaMKDYpnHKx6BpgQd1eTHJyARm/Ld8Q+UukQHVIK7jR3ZOJsX8p
nKc3T1zweBGjCFA7L4EN5Bi/gY65GKs30TnSosp7QHJky7TY+R2XbRkOLTWrKXbu
SjMHzeqQax+i8UX3ELCjDMu5yRZUEgf8NgRKppUQG5WXVYVGxzGZuRqngSawAeaj
nW/fN1qOCNplkg+Jiurz/asGku4KJXSpq6I9RP07IlmyOC8vmmI9POdKAXmORIOF
Bdx9U4d5XbRfKqRvG2xV1RgG1wtNhNEF/KgTgigz6RsQbfWXUJs1EGf1SLaR2gqJ
NoOjnVgvFRw/AJK8W8fa
=yR1D
-----END PGP SIGNATURE-----