

# To regulate cryptocurrencies, treat the tech as a tool, not a threat

Decentralized blockchain networks are a continuation of technological evolution

*For digital ledgers tracking ownership & transfer of assets:* As information becomes widely available & distributed, the ledger no longer needs to be private, centralized, or maintained by a single entity on an electronic database



**Financial regulators & policymakers can embrace decentralized blockchain technology to further their own objectives**

- Technological innovation historically has required new financial regulations
- Regulators have used technology to advance safe & stable markets

## Regulatory Concern

## Current Approach

## Blockchain Benefits



### Maintaining Market Data Reliability

**Need:** Accurate & nearly real-time view into state of a specific market



**Achieved Today By:** Reporting obligations imposed on market participants

#### Challenges of Current System:

- 1) *Piecemeal* - Institutions and financial intermediaries report their own actions to regulator → *No single source of truth; Incorrect data can skew the picture*
- 2) *Stale data* - Regulations require quarterly reports → *Market views can now be several months old*



#### Blockchain Ledger is:

- Always-on
- Tamper resistant
- Publicly available

#### Regulators can:

- Ascertain current state of a blockchain-based market
- Act on accurate information tailored to market conditions



### Safety of Customer Assets

**Need:** If a customer entrusts a 3<sup>rd</sup> party with assets—cash, stocks, or bonds—this 3<sup>rd</sup> party must act properly



**Achieved Today By:** Targeting centralized third parties with specific regulations for various activities (e.g., custody, money transmission, etc.) and holding intermediaries accountable

#### Challenges of Current System:

- 1) *No way to verify* that an intermediary does what they claim
- 2) *Regulators rely on representations*, becoming aware of wrongdoings after the fact



#### Blockchain can:

- Verify association between a token held by an individual/entity and a wallet on a blockchain network
- No third party can change ledger data once entered

#### Regulators can:

- Trust data recorded on blockchain ledger



### Keeping Bad Actors out of Financial Markets

**Need:** Ensuring sanctioned entities do not access legitimate markets



**Achieved Today By:** Identity related regulatory requirements (e.g., KYC), and relying on intermediaries to monitor compliance

#### Challenges of Current System:

*Lack of full transparency*



#### Blockchain can:

- Track all assets moving between wallets

#### Regulators can:

- Access a consistently verifiable audit trail of any asset back to its genesis
- Determine if an asset has passed through a sanctioned wallet

**Regulators can maintain oversight of markets on a “self-sovereign” basis: eliminating need to rely solely on intermediary disclosures; enabling direct access to accurate, updated, and verified network data; unlocking new opportunities**

## Questions to be Answered

- How will “on-chain” identity be tied to “off-chain” identity?
- How do we build systems that simultaneously use the benefits of public blockchains while maintaining transaction privacy?
- What security measures can be implemented to better safeguard private keys from theft or inadvertent loss?

**Regulators can evaluate how the answers to these questions will help bring insights and further benefits**