



January 17, 2017

Office of the Comptroller of the Currency  
440 7<sup>th</sup> Street SW  
Washington, D.C. 20219

*Via Electronic Submission*

**Re: Response to Request for Comments on *Exploring Special Purpose National Bank Charters for Fintech Companies***

Poloniex, Inc. is pleased to respond to the Office of the Comptroller of the Currency's (OCC) request for comments on its paper titled *Exploring Special Purpose National Bank Charters for Fintech Companies*. We applaud the OCC for engaging in this process and are encouraged by its inclination to work with fintech experts and stakeholders in order to create a framework that supports growth and innovation in the industry.

Poloniex, Inc. is a FINCEN registered Delaware corporation that has been providing a platform for subscribers to trade blockchain and digital assets since 2014. We strongly support any efforts to harmonize and advance the regulatory treatment of fintech companies because we firmly believe that blockchain technology has a significant amount of promise well beyond the use of digital currency. The United States and the world have barely begun to scratch the surface of this revolutionary new technology. Unfortunately, the current uncertainty of the existing regulatory structure threatens to stifle U.S.-based businesses and hurt our collective ability to fairly compete in the global marketplace.

We wholeheartedly agree with Comptroller Thomas J. Curry when he said that it is clear that "fintech companies hold great potential to expand financial inclusion, empower consumers, and help families and businesses take more control of their financial matters."<sup>1</sup> As leading industry stakeholders, Poloniex, Inc. is committed to working with the OCC and other regulators to continue to operate a platform that plays a central role in empowering consumers and expanding financial inclusion. Poloniex, Inc. believes that inclusion, communication, and collaboration with federal regulators is the single most critical component to the continued development, expansion, and success of our platform and the industry as a whole.

Please reach out to Shawn Smeallie of American Continental Group, Inc. at 202-327-8100 or [smeallie@acg-consultants.com](mailto:smeallie@acg-consultants.com) if you have any questions or concerns. We look forward to our continued dialogue. Thank you for your time and consideration.

Sincerely,

Jules Kim  
Chief Operating Officer  
Poloniex, Inc.

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<sup>1</sup> Curry, Thomas J. "OCC to Consider Fintech Charter Applications, Seeks Comment." <https://www.occ.treas.gov/news-issuances/news-releases/2016/nr-occ-2016-152.html> (accessed January 17, 2017).