OTCM Protocol - Updated Roadmap for Issuer-Authorized Tokenized Securities Aligned with SEC January 28, 2026 Guidance

https://www.sec.gov/files/ctf-written-input-otcm-protocol-013026.pdf

The Honorable Paul S. Atkins

U.S. Securities and Exchange Commission

100 F Street NE Washington, D.C. 20549

Re: OTCM Protocol - Updated Roadmap for Issuer-Authorized Tokenized Securities Aligned with SEC January 28, 2026 Guidance

Dear Chairman Atkins, OTCM Protocol ("OTCM") is a financial technology platform focused on tokenizing illiquid over-thecounter securities through issuer-authorized structures. We write to express our strong endorsement of the Commission's January 28, 2026, joint statement on tokenized securities, which provides the regulatory clarity our industry has long sought, and to respectfully submit our updated perspective on how OTCM's model exemplifies the Commission's preferred Category 1 issuer-sponsored tokenization framework.

OTCM addresses one of American finance's most pressing yet overlooked problems: the systematic abandonment of over 11,000 companies trading on over-the-counter markets, trapping an estimated $50+ billion in shareholder value. Through innovative blockchain technology and issuer-authorized tokenization utilizing the SEC's preferred Category 1 structure—with direct issuer board authorization, SEC-registered transfer agent custody, and 1:1 equity backing—OTCM demonstrates how compliant crypto innovation can revitalize failing traditional financial infrastructure while enhancing investor protections.

Revision #1
Created 2026-07-31 15:27:48 UTC by SBS Admin
Updated 2026-07-31 15:29:55 UTC by SBS Admin