Matter Labs Technologies, Inc.
228 Park Ave S
New York, NY 10003

July 24, 2026

Vanessa Countryman, Secretary

U.S. Securities and Exchange Commission

100 F Street, N.E.

Washington, D.C. 20549-1090

Sent via Email: rule-comments@sec.gov

Re: File No. 4-913 — Roundtable on Preparations for 24-Hour Trading

Dear Ms. Countryman:

Matter Labs Technologies Inc., a Delaware company that builds blockchain infrastructure and employs a U.S.-based team, submits these comments in connection with the Commission's roundtable on preparations for 24-hour trading in the U.S. equity markets. We welcome the Commission's focus on the operational readiness and resiliency questions that continuous trading raises.

Extending U.S. equity markets toward around-the-clock trading places new demands on the infrastructure that supports trading, settlement, and post-trade operations. In a 24-hour market, systems must remain available and resilient without the overnight windows that market participants have historically relied on for reconciliation, maintenance, and recovery. We encourage the Commission to give particular attention to three areas:

- **Continuous operational resiliency**: standards for uptime, failover, and recovery that assume no daily market close, so that a fault during overnight hours does not cascade across the market.
- **Settlement and recordkeeping integrity**: mechanisms that maintain a reliable, verifiable record of transactions on a continuous basis, and that reconcile cleanly across venues operating in different time zones.
- **Data privacy alongside transparency**: infrastructure that supports regulatory visibility and auditability while protecting sensitive participant and order information in an always-on environment.

Distributed-ledger and cryptographic infrastructure, including permissioned network designs, offers approaches to continuous availability, verifiable recordkeeping, and controlled information access that are relevant to these questions. We would welcome the opportunity to share our

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operational perspective with the Commission and its staff as this work develops, and we are glad to provide additional detail or participate in the roundtable discussion.

We appreciate the Commission's consideration of these comments.

Respectfully submitted,

Noah Pravecek

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Head of Product, Interop

Matter Labs Technologies Inc.

Audit trail

Details

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