

September 24, 2026

Via the Commission's internet comment form
Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: File No. 4-927 - Release No. 34-106402 (September 17, 2026): Questions 1, 3, 5 and 6

Dear Ms. Countryman:

Summary. MONARK Bell keeps a public, signed record of how tokens that track U.S. equities trade on public ledgers, in particular while U.S. markets are closed, and publishes its method. On Questions 3 and 6, we report what Bell measures and suggest four properties that the Commission could expect from a TSV's publication under Section II.G, so that a third party could recompute what a venue reports; Bell applies them to its own records.

1. What the Order asks, and what it relies on

The Commission "intends to monitor closely the use of the exemptions" (Section VI, p. 57). Several conditions rest on what each TSV reports about itself. A TSV computes its volume against the Tier limits (Section II.F, p. 24) and publishes its transaction data "in a machine-readable format" (Section II.G, p. 28). Such a TSV "would not be subject to the same books and records, examinations, and other oversight requirements" as exchanges and ATSS (Section II, p. 17), though it must consent to staff examinations "at any time" (Section II.L, p. 35).

The Commission "recognizes that a TSV may inadvertently exceed a volume threshold, for example, due to a miscalculation in either a numerator or denominator" (Section II.F, p. 26), and designs the volume limits "to help limit the potential impact of any price dislocations" (Section II.F, p. 28). It observes that automated market maker (AMM) transparency "may potentially obviate the need for certain regulations" (Section I.B, p. 12) and lists "public auditability of the distributed ledger" among the audit types a TSV may describe (Section III, item x, p. 44).

Question 3 asks how TSV trading could "potentially impact the liquidity, pricing, or trading of underlying NMS stock", the effects of ten-minute reporting and "overnight trading" on market quality, and what, if any, modifications "should be made to the TSV Exemption" (Section VI, Question 3, pp. 57-58). Question 6 asks whether the Tier limits are appropriate and invites modifications (Question 6, p. 58). Both concern quantities that Bell measures outside the venues.

2. What Bell measures on Questions 3 and 6

Population. Bell's data come from four tokens, TSLAx, AAPLx, NVDAx and SPYx, traded on public AMM pools on Solana, not on a TSV. We make no representation that they are Tokenized NMS Stock: the Order excludes an asset that "provides synthetic exposure to an underlying security" (Section I, p. 2). The method, not this population, is designed to apply to TSV pools. As of September 24, 2026, Bell's latest publication covers sessions of September 16, 2026 for TSLAx, AAPLx and SPYx, from 3,110, 2,619 and 2,244 on-chain fills respectively.

Question 3. For each session (weekday overnight, weekend, holiday), Bell publishes $g = \ln(P_{\text{session}} / P_{\text{close}})$, where P_{session} is the volume-weighted average price, per underlying share, of the token's on-chain fills, and P_{close} the last consolidated closing price, cross-read on a second source. We adopt the

Table 4 statistic of Cong, Landsman, Rabetti, Zhang and Zhao, "Tokenized Stocks" (SSRN 5937314, December 2025, p. 32): the share of observations deviating from the last close beyond a threshold.

For the Tesla xStock over September-October 2025, they report deviations beyond 1 percent in 71 percent of weekday-overnight hours and 15 percent of weekend hours, and beyond 5 percent in 12 and 0 percent; they also report a 2 percent threshold. Bell flags, for each session, whether the deviation exceeds 1, 2 or 5 percent. As of September 24, 2026, its published sessions include one weekday-overnight session for each of TSLAx and AAPLx and no weekend session, and no share is reported from them. Units, closing-price sources, samples and session definitions differ; any comparison is descriptive.

This statistic describes the size and frequency of off-hours deviations from the last close. It measures no effect of overnight trading or of ten-minute reporting on the underlying market or on its opening, reopening or closing processes, and implies no causal link.

Question 6. For each session, Bell publishes the ratio of the volume in its observed pools, recomputed from on-chain swaps counted once per transaction and converted to shares with the on-chain shares-per-token multiplier, to the underlying stock's average daily share volume in the calendar month before the session date. These pools are not TSVs; the ratio describes on-chain activity in the observed pools, not whether any venue is within a limit.

3. What the Commission could expect from a TSV's publication

In answer to the requests for modifications in Questions 1, 3, 5 and 6, we suggest four properties that the Commission could expect from a TSV's transaction data under Section II.G. None changes a limit; each lets a third party recompute what a venue reports.

- *Recomputable from the ledger.* Each published transaction identifies its on-chain transaction, so that a third party could recompute its price, size, time and direction from the public, permissionless ledger (Section II.A, p. 18), and its dollar value from the declared conversion method.
- *Named abstention.* When a value cannot be established, the publication gives a named reason instead of an estimate, and counts such cases.
- *Signed and chained digest.* Publications are signed and hash-chained, each publication carrying the digest of its content and of the previous line, so that a later edit is detectable by recomputation with the published public key.
- *Dated periods.* Each published volume states its period, measured back from a publication time "as determined by the TSV" (Section II.G, note 81, p. 29), and any figure read against a Tier limit names its denominator's month and source, so that a miscalculation in either term can be located.

Bell applies these properties to its own records, outside the TSV framework:

- *Recomputable.* For TSLAx, AAPLx and NVDAx, Bell established the multiplier history used for per-share prices from transaction-level ledger data, obtained through one operator's enumeration and cross-read on a second endpoint for the multiplier events. A defective page, including a multiplier-event mismatch, is not recorded and stops the run; a run is complete only if a separate query for the latest transaction up to a pinned slot returns the last one recorded; a second method, scanning the transactions of the account authorized to update the multiplier, gave the same history, event for event. With the same closing price and daily share volumes, obtained under the reader's license and never republished by Bell, each gap and ratio can be recomputed with the formulas of Bell's published method.

- *Named abstention.* When a gap's closing price or multiplier cannot be established, Bell abstains with a named reason and counts abstentions in its published state file: in its publication of September 23, 2026, all four TSLAx sessions abstained with `no_close_ref`, a missing closing price; in that of September 24, a gap is computed for each of its nine sessions.
- *Signed and chained digests.* Bell's public timeline is chained line by line, each line carrying the digests of the files it publishes, and signed with an Ed25519 key whose public half is published; a signature shows origin, not truth. Timestamp anchoring of these publications is in preparation. The logs of the enumeration run described above are chained by SHA-256, and a manifest of their digests was submitted to OpenTimestamps at each start, end and resumption: as of September 24, 2026, all 16 proof files record a Bitcoin block (not checked against a node). An anchor shows a log head existed before a Bitcoin block, not where its pages came from or that the scan ran.
- *Dated periods.* Each gap is keyed to the trading day of its closing price by a published rule, and each ratio is published with its session window and the month of its denominator.

Bell's records are published from a dedicated host operated by MONARK; the signing key is generated on it. We claim independence from the venues and issuers measured (MONARK has no commercial relationship with the issuers or venues measured as of the filing date), not from MONARK.

4. Declared limits

- Bell cannot detect a transaction omitted inside an otherwise complete page returned by the operator; for the multiplier history, the second method reduces this risk without removing it.
- Sample: four symbols of one token family on one chain, outside the TSV framework, over the stated windows; results do not extend to other tokens, chains or TSVs.
- Bell is neither a TSV nor a Covered Firm. It does not assess compliance with any condition of the Order, and its records are not a certification.

5. Availability

State and timeline: <https://bell.monarkgate.tech/state.json>, <https://bell.monarkgate.tech/timeline.jsonl>.

Method (session bounds, formulas, periods, residuals), with the public key and the anchors:

<https://monarkgate.tech/bell/method>. Contact: bell@monarkgate.tech.

Respectfully submitted,

Stan E Malone
Founder, MONARK