



250 Massachusetts Avenue, N.W.
Washington, D.C. 20001
robinhood.com

October 7, 2025

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549-1090

Re: File Number 600-39, Paxos Securities Settlement Company, LLC; Notice of Filing of an Application for Registration as a Clearing Agency Under Section 17A of the Securities Exchange Act of 1934

Dear Ms. Countryman,

Robinhood Markets, Inc.¹ (“Robinhood”) submits this letter regarding the application by Paxos Securities Settlement Company, LLC (“PSSC”) to register as a clearing agency under Section 17A of the Securities Exchange Act of 1934 (“Exchange Act”). Robinhood’s mission is to democratize finance for all by providing access to investing regardless of a customer’s income or wealth. Using technology to open the markets to retail investors from all backgrounds and remove traditional barriers to investing is central to our mission, and we have made investing and trading more accessible to many investors.

We support innovation, competition, and access across markets, products, and services. Securities and Exchange Commission (“SEC”) approval of the Paxos Settlement Service (“PSS”), through which PSSC would provide clearance and settlement services, would represent an important step forward in modernizing U.S. capital markets. PSS will enable flexibility in clearing cycles through the advent of sophisticated real-time netting and settlement capabilities. These capabilities would present an alternative to clearing through The Depository Trust & Clearing Corporation. This competition can help lower costs, accelerate the transition toward real-time settlement, and ultimately reduce expenses for retail investors.

Bilateral settlement through the PSS offers several advantages. First, settlement finality reduces overnight exposure and systemic risk. Second, by eliminating the central counterparty guarantee, market participants can deploy more capital to provide services for investors. Third, the PSS settlement services provide flexibility that better aligns with modern trading activity and investor expectations. As a result, retail investors should benefit from faster settlement, lower costs, and enhanced transparency.

PSS would offer both net settlement on trade date and traditional “regular-way” settlement cycles. This allows market participants to choose a settlement model and also creates opportunities for new innovation in products and services. This can help ensure that our markets remain resilient, competitive, and forward-looking. The presence of a technologically advanced

¹ Brokerage services are offered through Robinhood Financial LLC and Robinhood Securities LLC, which are FINRA-member broker-dealers and wholly owned subsidiaries of Robinhood. Cryptocurrency services are offered through Robinhood Crypto, LLC, a wholly owned subsidiary of Robinhood.



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participant should incentivize legacy providers to modernize and improve services. Timely competition and technological advancement are essential to protecting market integrity and investor interests.

Robinhood cares deeply about our customers' trading experience, and we encourage regulatory acceptance of new products and services that expand competition, promote innovation, and improve access for retail investors. With appropriate safeguards, PSS can deliver faster settlement, lower costs, improved transparency, and a stronger market infrastructure for the benefit of all investors.

Robinhood appreciates the opportunity to submit this comment letter. Please contact Robinhood's General Counsel, Lucas Moskowitz, at lucas.moskowitz@robinhood.com if you have any questions or comments.

Sincerely,

Signed by:


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Matt Billings

Vice President of Brokerage

President, Robinhood Financial, LLC and Robinhood Securities, LLC