

In regards to rule SR-OCC-2024-001 34-99393,

I vote no to this rule proposal because it does not help in any risk control, it just temporarily contains it and adds to it in the long term. It creates a greater systematic risk in the future.

This encourages bad behaviour, this encourages more entities to be living in the risk area because they know if the criteria is met, they will be saved and will play riskier bets.

In your own document you say that there is an expected 99% shortfall. To drop this lower from 99% expected, to 10%-5%, there should be requirements to deposit more collateral to lower this expected shortfall amount, not to let them off the hook because they have too much expected shortfall.

Appreciatively,

Anonymous