



September 24, 2025

Tian Huang and Shane Shannon
Counselors to the General Counsel
U.S. Department of the Treasury
1500 Pennsylvania Avenue NW
Washington, DC 20220

Re: Request for Extension of Comment Period – GENIUS Act Implementation ANPRM (RIN 1505-ZA10)

Dear Counselors:

We appreciate Treasury's leadership in advancing regulatory clarity for payment stablecoins and its commitment to public engagement. On behalf of the American Bankers Association, along with American's Credit Unions, Bank Policy Institute, Community Development Bankers Association, Consumer Bankers Association, Independent Community Bankers Association, National Bankers Association, and The Clearing House Association, we respectfully request an extension of the 30-day comment period for the Advance Notice of Proposed Rulemaking (ANPRM) issued by the Department of the Treasury regarding the implementation of the Guiding and Establishing National Innovation for U.S. Stablecoins (GENIUS) Act.

The ANPRM poses nearly 60 foundational questions across a wide range of complex and interrelated topics, including regulatory clarity, issuer requirements, illicit finance, foreign comparability, taxation, insurance, and economic data. These questions touch on core elements of a future regulatory framework for payment stablecoins and digital asset service providers, and will have significant implications for financial institutions, consumers, and the broader digital asset ecosystem.

Given the breadth and depth of the issues raised—and the importance of providing Treasury with thoughtful, data-informed, and actionable feedback—we believe that a 30-day comment period is insufficient. A longer comment period would allow stakeholders to engage with member institutions and experts to gather meaningful input.

We respectfully request that Treasury extend the comment period by an additional 60 days, for a total of 90 days from the date of publication in the Federal Register. This extension would ensure that Treasury receives comprehensive and well-considered responses that support the development of a robust and effective regulatory framework under the GENIUS Act.

Thank you for your consideration of this request. We look forward to engaging on this important topic.

Sincerely,

American Bankers Association

America's Credit Unions

Bank Policy Institute

Community Development Bankers Association

Consumer Bankers Association

Independent Community Bankers Association

National Bankers Association

The Clearing House Association

About the Signers

The American Bankers Association is the voice of the nation's \$25 trillion banking industry, which is composed of small, regional and large banks that together employ approximately 2.1 million people, safeguard \$19.7 trillion in deposits and extend \$13.1 trillion in loans.

America's Credit Unions is the unified voice for not-for-profit credit unions and their more than 144 million members nationwide. America's Credit Unions provides strong advocacy, resources and services to protect, empower and advance credit unions and the people and communities they serve. For more information about America's Credit Unions, visit AmericasCreditUnions.org.

The Bank Policy Institute ("BPI") is a nonpartisan group representing the nation's leading banks. BPI members include universal banks, regional banks, and the major foreign banks doing business in the United States. Collectively, BPI members hold \$10.7 trillion in deposits in the United States; make 68% of all loans, including trillions of dollars in funding for small businesses and household mortgages, credit cards, and auto loans; employ nearly two million Americans and serve as a principal engine for the nation's financial innovation and economic growth.

The Community Development Bankers Association (CDBA) is the national trade association for banks and thrifts that are certified Community Development Financial Institutions (CDFIs). Our member banks are mission-driven financial institutions dedicated to fostering economic growth and access to capital in low- and moderate-income, rural, and Native communities through responsible lending, investment, and financial services.

The Consumer Bankers Association represents America's leading retail banks. We promote policies to create a stronger industry and economy. Established in 1919, CBA's corporate member institutions account for 1.7 million jobs in America, extend roughly \$4 trillion in consumer loans, and provide \$275 billion in small business loans annually. Follow us on X @consumerbankers.

The Independent Community Bankers of America® has one mission: to create and promote an environment where community banks flourish. We power the potential of the nation's community banks through effective advocacy, education, and innovation. As local and trusted sources of credit, America's community banks leverage their relationship-based business model and innovative offerings to channel deposits into the neighborhoods they serve, creating jobs, fostering economic prosperity, and fueling their customers' financial goals and dreams. For more information, visit ICBA's website at <https://www.icba.org/>.

Founded in 1927, the National Bankers Association (NBA) champions minority depository institutions, advocating for mission-driven banks that serve underserved and low- to-moderate-income communities. Representing community banks across 43 states and territories, NBA promotes economic empowerment, capital access and financial inclusion. Learn more at www.nationalbankers.org.

The Clearing House Association L.L.C., the country's oldest banking trade association, is a nonpartisan organization that provides informed advocacy and thought leadership on critical payments-related issues. Its sister company, The Clearing House Payments Company L.L.C., owns and operates core payments system infrastructure in the U.S., clearing and settling more than \$2 trillion each business day.