

Question: 17. TBD What types of firms should serve as intermediaries for CBDC? What should be the role and regulatory structure for these intermediaries?

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Question

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1. **What types of firms should serve as intermediaries for CBDC?**
2. **What should be the role and regulatory structure for these intermediaries?**

Answer

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The answer depends on:

- Currency Model(s) are adopted, see section [08_currency_models](#))
- Architectural choices, see section [70_dualnets](#)
- Design considerations, see section [30_stablecoins](#)

Currency Model Considerations

Digital Cash Model

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Using a [Digital Cash Model](#) it would be expected that all the existing Intermeidaire types continue to serve in their existing roles, however, these would have to be extended to support the new form of cash. There may need to be new intermediaries that exclusively use the new Digital Cash in ways yet to be determined but mostly like online services.

What should be the role and regulatory structure for these intermediaries?

The regulatory structure should be the same as the current system for both the current Intermediaries

types as well as any new Intermediaries types unless new laws and regulations are enacted to specifically exempt the CBDC from existing 60+ laws and regulations governing:

- [National Privacy Considerations](#)
- [National Security Considerations](#)
 - [Human Trafficking](#)
 - [Drug Trafficking](#)
 - [Corruption](#)
 - [Money Laundering](#)
- 3. [International Considerations](#)
 - [Data Residency](#)
 - [Data Sovereignty](#)
 - [Data Localization](#)

Digital Account Model

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Using a [Digital Account Model](#) it would be expected that all the existing Intermediaries types continue to serve in their existing roles, however, these would have to be extended to support the new form of cash most likely offering the ability to keep account balances denominated in either U.S. Dollars or in U.S. CBDC. The main benefit of using U.S. CBDC would be to use the CBDC Network to transfer money in near real-time versus using the traditional [Automated Clearing House \(ACH\) Network](#).

What should be the role and regulatory structure for these intermediaries?

The regulatory structure should be the same as the current system for both the current Intermediaries types as well as any new Intermediaries types unless new laws and regulations are enacted to specifically exempt the CBDC from existing 60+ laws and regulations governing:

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- [National Security Considerations](#)
 - [Human Trafficking](#)
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Dual Payment Model

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Using a Dual Payment Network Model of [Automated Clearing House \(ACH\) Network](#) and a U.S. CBDC Network as described in Figure 1, the existing Intermediaries would continue to play a role, however, they would have to adapt their existing policies and procedures to allow for the use of both the U.S. Dollar based ACH and to support the use of the near real-time U.S. CBDC network while using CBDC.

What should be the role and regulatory structure for these intermediaries? The role and regulatory structure for these intermediaries would remain largely unchanged except for having to account for U.S. CBDC as part of the Banking Reserves.

The regulatory structure should be the same as the current system for both the current Intermediaries types as well as any new Intermediaries types unless new laws and regulations are enacted to specifically exempt the CBDC from existing 60+ laws and regulations governing:

- [National Privacy Considerations](#)
- [National Security Considerations](#)
 - [Human Trafficking](#)
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 - [Data Residency](#)
 - [Data Sovereignty](#)
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There would also be a need for Intermediaries that exclusively use a new U.S. CBDC. These intermediaries would need to also participate in having Banking Reserves, be subject to auditing and follow all the existing Laws and Regulations such as, [Privacy](#), [Security](#), and [International Agreements](#)



Figure 1: Theoretical Very Simplified Dual ACH-CBDC Network Concept.

Design Considerations

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Design considerations, see section [30_stablecoins](#)

Examples

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Discussion of Examples

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