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Name of institute/individual:	Austrian Federal Economic Chamber, Division Bank & Insurance
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Consultative document:	Disclosure of cryptoasset exposures (/bcbs/publ/d556.htm)
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Comments:
There are two points on the last page (17) of the document https://www.bis.org/bcbs/publ/d556.pdf that seem unclear:

Classification condition 3 [SCO60.16] to [SCO60.17] Banks must describe the following:

• The risks of the network in which the cryptoasset operates and how these are mitigated and managed.
What are the possible "risks of a network". If there is an obvious one, nobody would use it. If the "risks" are mitigated and managed, are there risks anymore?
Maybe the document should be more concrete in what is expected here.

The following point then says:
• The risk governance and risk control policies of the entities performing the activities associated with the functions of the cryptoasset, such as issuance, validation, redemption and transfer of the cryptoassets to address the risks described in [SCO60.17](1).

The mentioned properties issuance, redemption and validation are properties of the particular asset, not of the network. The transfer is part of the network functionality.
This does not seem to be appropriately separated.