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Q1. Do you agree with the features and categories of digital fraud? Are there additional financial stability and/or prudential transmission channels from digital fraud to the banking system?

I agree. However, I would also add one special category or focus on DeFi and Digital Economy based on Distributed Ledger Technology. Furthermore, it is very important and up to date to consider CBDCs. It is also missing a matrix of responsibilities. We could map in this paper some potential actors responsible for controls in each step. The tokenization of economy is also something that has not fully well understood or explored risks.

Q2. What other data sources could the Committee consider when assessing the risks of digital fraud?

Data about DeFi and use of DLTs.

Q3 Are there any additional, banking-specific, initiatives on digital fraud that could be pursued by the Committee?

We could map and consider cases using tokenization and Blockchain.