

May 12, 2026

Office of the Secretary
Public Company Accounting Oversight Board
1666 K Street, NW
Washington, DC 20006-2803

RE: PCAOB Release No. 2026-001 — Request for Public Comment on PCAOB Strategic Priorities

Dear Madam Secretary:

I. INTRODUCTION AND EXECUTIVE SUMMARY

AuditChain Labs AG (“AuditChain”) respectfully submits this comment in response to the Public Company Accounting Oversight Board’s (“PCAOB” or “Board”) Request for Public Comment on its 2026–2030 strategic priorities.¹ AuditChain is an assurance technology company. We operate Pacioli.ai, a decentralized physical infrastructure (“DePIN”) for external validation of regulatory disclosures, and MiCA Pacioli.ai, our operational deployment under the European Union’s Markets in Crypto-Assets Regulation. We are a member of XBRL US, Inc., initiated the formation of the XBRL US Digital Asset Working Group, and are developing XBRL disclosure taxonomies for the Guiding and Establishing National Innovation for U.S. Stablecoins Act (“GENIUS Act”)² and the pending Digital Asset Market Clarity Act of 2025 (“CLARITY Act”). This is the fifth in a coordinated series of submissions AuditChain has made to federal financial regulators addressing the machine-readable disclosure infrastructure of the U.S. digital asset regulatory ecosystem, following submissions to the FDIC, OCC, NCUA, and SEC.³

This comment is grounded in a single thesis: audit transformation enables oversight transformation. Bringing machine-readable disclosure within audit scope is the foundation of that transformation. Once the machine-readable layer is assured, the audit trail can be cryptographically enforced from internal controls through business events, transactions, and accounting policies up to the public disclosure instance — straight-through, automated, verifiable. The PCAOB sits at the precise institutional position to lead.

¹PCAOB Release No. 2026-001, Request for Public Comment on PCAOB Strategic Priorities (Mar. 31, 2026), available at <https://pcaobus.org/news-events/news-releases/news-release-detail/pcaob-requests-public-comment-on-strategic-priorities>

²Guiding and Establishing National Innovation for U.S. Stablecoins Act, Pub. L. No. 119-27, 139 Stat. 419 (2025) (codified at 12 U.S.C. §§ 5901–5916) (“GENIUS Act”).

³AuditChain Labs AG, Comment Letter on RIN 3064-AG20 ([Feb. 9, 2026](#)) and Supplemental Comment ([March 9, 2026](#)) (FDIC payment stablecoin issuance application requirements); AuditChain Labs AG, Comment Letter on Docket ID [OCC-2025-0768-0016](#) (Feb. 11, 2026) (OCC national bank chartering amendments); AuditChain Labs AG, Comment Letter on Docket ID [OCC-2025-0372-0122](#), RIN 1557-AF41 (Mar. 9, 2026) (OCC implementation of the GENIUS Act); AuditChain Labs AG, Comment Letter on [NCUA-2025-1335-0034](#), RIN 3133-AF69 (NCUA implementation of the GENIUS Act); AuditChain Labs AG, Comment Letter on File Number 4-894 ([April 20, 2026](#)) (SEC Staff Statement on broker-dealer registration requirements for Covered User Interface Providers).

We respectfully recommend three actions at three altitudes. **First**, harmonize U.S. auditor responsibility for machine-readable disclosure with the framework adopted by the Committee of European Auditing Oversight Bodies in its November 2021 ESEF guidelines, through a targeted amendment to AS 4101. **Second**, commit at the strategic level to evolving auditing standards to accommodate cryptographically enforced audit trails, of which AuditChain's Pacioli.ai is a working proof of concept. **Third**, anticipate the digital asset audit engagement universe that the GENIUS Act and the pending CLARITY Act will produce — beginning with the registered public accounting firm examination of payment stablecoin reserves that the GENIUS Act has already imposed by statute.

II. THE REGULATORY MOMENT AND THE MACHINE-READABLE FOUNDATION

The pace and intensity of federal financial-regulatory rulemaking in 2025–2026 is without parallel in recent memory. The GENIUS Act has put five federal financial regulators into simultaneous implementation. The pending CLARITY Act will, on enactment, set the SEC, the CFTC, and the federal banking regulators into another wave of rulemaking. The Financial Data Transparency Act (“FDTA”)⁴ joint data standards rulemaking is in active inter-agency development across the nine federal financial regulators within its scope: the Department of the Treasury, the Federal Reserve Board, the SEC, the CFTC, the FDIC, the OCC, the NCUA, the CFPB, and the FHFA.⁵ Each of these nine agencies is a throughput for machine-readable regulatory data. Every framework each agency implements — bank call reports, broker-dealer custody and supervisory data, payment stablecoin reserve disclosures, derivatives reporting, money market fund disclosures, mortgage market reports, consumer credit data, securities and securitization filings — feeds machine-readable instances into a single national disclosure architecture that the FDTA is in the process of unifying.

This federal scope is matched at the subnational level. Roughly 90,000 state, county, municipal, and special-district governments file financial information into structured reporting systems, including the Municipal Securities Rulemaking Board's Electronic Municipal Market Access (EMMA) platform for municipal securities disclosures.⁶ The federal disclosure layer rests on top of a subnational layer of comparable scale. Together, these layers form a machine-readable disclosure architecture without precedent in any major capital market.

That architecture positions the United States to become the machine-readable capital of the world and the assured-data foundation for the on-chain migration of the U.S. capital markets — a migration the GENIUS Act has already accelerated for payment stablecoins and the pending CLARITY Act will extend across digital asset securities and commodities. Machine-readable

⁴Financial Data Transparency Act, Title LVIII of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, 136 Stat. 2395 (Dec. 23, 2022) (“FDTA”).

⁵12 U.S.C. § 5334(a)(1) (as added by FDTA § 5811) (defining “covered agency” as the Department of the Treasury, the Board of Governors of the Federal Reserve System, the Office of the Comptroller of the Currency, the Federal Deposit Insurance Corporation, the National Credit Union Administration, the Consumer Financial Protection Bureau, the Federal Housing Finance Agency, the Securities and Exchange Commission, and the Commodity Futures Trading Commission).

⁶U.S. Census Bureau, 2022 Census of Governments — Organization Component (counting 90,837 local governments in the United States, in addition to 50 state governments), available at <https://www.census.gov/programs-surveys/cog.html>. Municipal securities disclosures filed through the Municipal Securities Rulemaking Board's Electronic Municipal Market Access (EMMA) platform are within the FDTA's structured-data scope.

disclosure is not adjacent to that migration; it is its prerequisite. Tokenized financial assets, ultimately measured in the hundreds of trillions of dollars across the U.S. and global markets, require structured, verifiable, machine-processable disclosure to function at scale.

The PCAOB sits at the assurance layer of this architecture. Every disclosure regime — federal, subnational, on-chain, tokenized — generates a population of statements whose integrity depends on assurance work performed by registered public accounting firms under PCAOB standards. The 2026–2030 strategic plan either anticipates and consolidates this position for the next generation of American capital markets, or it concedes the moment to other jurisdictions whose audit oversight bodies — most notably the Committee of European Auditing Oversight Bodies — have already moved. There is no third option, and there will not be another comparable opportunity for some time. We respectfully urge the Board to lead.

III. MACHINE-READABLE DISCLOSURE UNDER AUDIT

The European Single Electronic Format (“ESEF”) regime, implemented under Commission Delegated Regulation (EU) 2019/815,⁷ requires EU-listed issuers to file annual financial reports in Inline XBRL format. The Committee of European Auditing Oversight Bodies (“CEAOB”), composed of EU member-state audit oversight bodies and the European Securities and Markets Authority, issued guidelines (revised November 9, 2021) directing auditors of ESEF filings to perform a defined set of procedures over the machine-readable layer of the financial statements — planning, controls evaluation, format verification, mark-up procedures, materiality, risk assessment — and to express a separate opinion in the audit report on whether the presentation in ESEF format complies, in all material respects, with the applicable requirements.⁸ Under the CEAOB framework, machine-readable disclosure is part of what the auditor opines on. It is not an exhibit appended to the audited financial statements; it is the audited financial statements expressed in a form accessible to machine processing.

The U.S. position took a different path. The Commission’s 2018 Inline XBRL adopting release exempted the Interactive Data File from AS 2710, AS 4101, and AS 4105, and stated that filers are not required to obtain assurance on the Interactive Data File or to involve auditors in its preparation.⁹ The consequences have been documented by the SEC Staff itself. The Division of Corporation Finance’s September 7, 2023 Sample Letter to Companies Regarding Their XBRL Disclosures catalogues six recurring categories of tagging defect — missing Inline XBRL presentation under Item 405 of Regulation S-T, scale mismatches between cover page and balance sheet, missing Pay-versus-Performance tags under Regulation S-K Item 402(v),

⁷Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format (“ESEF Delegated Regulation”).

⁸Committee of European Auditing Oversight Bodies, Guidelines on the Auditors’ Involvement on Financial Statements in European Single Electronic Format (ESEF), adopted Nov. 9, 2021 (“CEAOB Guidelines”), available at https://finance.ec.europa.eu/document/download/ce847777-0caa-47e1-8a9a-fcac34943878_en. The November 2021 Guidelines replace the initial guidelines adopted Nov. 28, 2019. CEAOB Guidelines ¶¶ 1–13 set out the auditor procedures and Annex 2 the documented risk taxonomy for completeness and accuracy of marked-up information; ¶¶ 14–17 provide for a separate opinion in the audit report.

⁹Inline XBRL Filing of Tagged Data, Release No. 33-10514, 83 FR 40846 (Aug. 16, 2018) (stating that auditors are not required to apply AS 2710, AS 4101, or AS 4105 to the Interactive Data File, and that filers are not required to obtain assurance on the Interactive Data File or to involve auditors or other third parties in its creation).

combined relationship disclosures missing separate tags, period-over-period inconsistency, and inappropriate custom tags — addressed by Staff after filing through a comment-letter process expressly grounded in the FDTA’s data-quality program.¹⁰ These are precisely the completeness and accuracy defects the CEAOB framework addresses ex ante through routine auditor procedures, at the source rather than downstream of issuance.

The PCAOB has direct statutory authority to close this gap. Section 103(a)(1) of the Sarbanes-Oxley Act, 15 U.S.C. § 7213(a)(1), directs the Board to establish auditing standards to be used by registered public accounting firms in the preparation and issuance of audit reports.¹¹ The Interactive Data File submitted under Item 405 of Regulation S-T (17 CFR § 232.405)¹² is part of the issuer’s filing under federal securities statutes, squarely within the Board’s standard-setting authority. The Supreme Court’s decision in *Free Enterprise Fund v. Public Company Accounting Oversight Board* confirmed that PCAOB members are inferior officers “directed and supervised” by the SEC and that the SEC exercises comprehensive oversight authority over the Board including approval of all Board rules,¹³ foreclosing any institutional objection. We respectfully recommend that the Board, as part of its 2026–2030 standard-setting agenda, propose an amendment to AS 4101 (or a complementary new standard) bringing the Interactive Data File within auditor responsibility for the filing, modeled on the CEAOB framework, with SEC approval under 15 U.S.C. § 7217(b) and Securities Exchange Act § 19(b).¹⁴

The benefits are immediate. The marginal cost to the audit is modest — verifying that tagged values match audited values, that tagged elements correspond to the disclosure’s accounting meaning, and that period-over-period element use is consistent — procedures the CEAOB framework already operationalizes through standard risk-based selection of marks. SEC Staff resources currently expended on the comment-letter workflow documented in the September 2023 sample letter would be redirected to substantive disclosure review. PCAOB inspections would independently verify auditor compliance. The integrity and reliability of U.S. machine-readable disclosure rises to parity with the EU framework with which the PCAOB already maintains extensive bilateral cooperation through arrangements with audit oversight bodies across more than ninety jurisdictions, including in Germany, France, the Netherlands, Spain, and other EU member states.¹⁵ And the FDTA’s data-quality mandate is addressed at the source rather than downstream of issuance.

¹⁰SEC Division of Corporation Finance, Sample Letter to Companies Regarding Their XBRL Disclosures (Sept. 7, 2023), available at <https://www.sec.gov/rules-regulations/staff-guidance/disclosure-guidance/sample-letter-companies-regarding-their-xbrl>. The release expressly grounds the Staff workflow in the FDTA’s data-quality program under Section 5825(a)(1) of the FDTA.

¹¹Sarbanes-Oxley Act of 2002, § 103(a)(1), Pub. L. No. 107-204, 116 Stat. 745, 755 (codified at 15 U.S.C. § 7213(a)(1)).

¹²17 CFR § 232.405.

¹³*Free Enterprise Fund v. Public Company Accounting Oversight Board*, 561 U.S. 477, 484–86, 509–10 (2010).

¹⁴Sarbanes-Oxley Act of 2002, § 107(b), 15 U.S.C. § 7217(b); see also Securities Exchange Act of 1934 § 19(b), 15 U.S.C. § 78s(b).

¹⁵See PCAOB, International Cooperative Arrangements with Non-U.S. Regulators, available at <https://pcaobus.org/oversight/international/regulatorycooperation> (describing the PCAOB’s registration of audit firms located outside the United States across more than 90 jurisdictions and cooperative inspection arrangements with EU member-state audit oversight bodies); see also Commission Implementing Decision on the adequacy of the competent authorities of the United States of America in relation to the Public Company Accounting Oversight Board (subsequently renewed) (authorizing EU member-state audit oversight bodies to enter cooperative arrangements with the PCAOB).

IV. FROM AUDIT TRANSFORMATION TO OVERSIGHT TRANSFORMATION

The harmonization recommended above is an entry point to a more substantial transformation. Once the machine-readable layer of the issuer’s financial statements is within audit scope, the audit trail supporting it can be reconstructed in machine-processable form from internal control attributes, through business events and transactions, through the application of accounting policies, up to the tagged disclosure value. Each link in that chain can be cryptographically attested, time-stamped, and independently verifiable — a continuous, cryptographically enforced audit trail rather than a periodic document-based reconstruction. Procedures over internal controls become procedures over attestable control attributes. Procedures over transactions become procedures over verifiable transaction records. Procedures over disclosure become procedures over cryptographically linked tagged values. The PCAOB’s auditing standards do not currently anticipate this architecture; the 2026–2030 strategic plan is the natural occasion to commit to a trajectory that does.

AuditChain operates Paciolli.ai, a decentralized physical infrastructure that performs external validation of regulatory disclosures using exactly this architecture. Paciolli.ai is in active operation today under the European Union’s Markets in Crypto-Assets Regulation through MiCA Paciolli.ai, validating required disclosures from digital asset service providers and issuers — applying cryptographic enforcement to the validation chain from underlying business records through accounting policy application to the public disclosure instance, enabling assurance providers to produce verifiable assurance artifacts that supervisors, counterparties, and investors can independently rely upon. The team efforts and technology development naturally anticipated the regulatory moment now arriving. It is the assurance counterpart to the machine-readable disclosure architecture that the FDTA, the GENIUS Act, the pending CLARITY Act, and EU regimes have collectively brought into being. Paciolli.ai is offered not as a proposal that any PCAOB standard endorse a specific technology or vendor, but as evidence that the architecture is technically feasible, operationally proven, and consistent with auditor independence and professional standards.

Audit transformation enables oversight transformation. Once disclosure is machine-readable and assured, supervisory technology ingests it directly: the PCAOB’s inspection program, the SEC’s Division of Corporation Finance, and adjacent regulators implementing the GENIUS Act, the FDTA, and the pending CLARITY Act all gain access to a higher-integrity disclosure layer. Real-time supervisory visibility — long discussed as an aspiration — becomes operationally feasible. The Board’s questions on technology and AI deployment for the investor-protection mission and on stakeholder transparency are answered by the same architectural commitment, including the delivery of PCAOB inspection findings in structured machine-readable form to support cross-firm and cross-period analysis by audit committees, investors, and adjacent regulators.

V. STANDARD-SETTING PRIORITIES FOR THE DIGITAL ASSET AUDIT UNIVERSE

The GENIUS Act has already conferred a new audit population on PCAOB-registered firms. Section 5903(a)(3) requires the monthly disclosure of reserve composition for Permitted Payment

Stablecoin Issuers to be examined by a registered public accounting firm.¹⁶ That examination is a statutory matter and takes effect alongside operational, compliance, and information technology risk management requirements at § 5903(a)(4) and weekly and quarterly reporting obligations imposed by the primary Federal payment stablecoin regulators in their implementing rulemakings. The CLARITY Act, on enactment, will extend the digital-asset audit universe across broker-dealers, exchanges, and tokenization platforms.

Each of these engagements raises assurance questions for which the existing PCAOB risk-assessment, internal-control, and audit-results-evaluation framework provides partial but incomplete coverage — on-chain reserve attestation, smart-contract control evaluation, private-key custody assertions, staking-reward recognition, and Blockchain Network Participation arrangements with affiliates and third-party service providers. Auditchain has developed a Blockchain Network Participation (“BNP”) disclosure taxonomy, which is the subject of our prior submissions to the FDIC, OCC, NCUA, and SEC.¹⁷ We do not propose that the PCAOB adopt the BNP taxonomy; that taxonomy operates at the disclosure level. We do recommend that the Board’s standard-setting agenda anticipate the assurance demands these disclosures will generate, that QC 1000-driven firm-level monitoring account for the structured assertion population that BNP and similar frameworks supply, and that PCAOB registration, inspection, and enforcement priorities track the digital-asset engagement population as it reaches material scale.

VI. AUDITCHAIN’S COMMITMENT AND TECHNICAL ASSISTANCE

Auditchain is committed to supporting the PCAOB’s strategic planning process and the standard-setting initiatives that follow from it. We are available to provide technical input on machine-readable disclosure infrastructure, cryptographically enforced audit-trail architecture, and the assurance demands of digital-asset audit engagements. Our MiCA Pacio.li.ai deployment provides operational data and engineering experience that may be of use as the Board considers the technology and AI questions raised in the request for comment. We have provided technical assistance to the FDIC, OCC, NCUA, and SEC in connection with our prior submissions and remain available on the same terms to the PCAOB.

VII. CONCLUSION

The convergence of GENIUS Act implementation, pending CLARITY Act passage, FDTA joint data standards rulemaking across nine federal financial agencies, and a subnational machine-readable reporting layer spanning roughly 90,000 state and local governments has put the United States within reach of a position no other major capital market currently holds: the deepest, most structured, most auditable disclosure ecosystem in the world. That position is the foundation on which the on-chain migration of the U.S. capital markets will rest, and the foundation that anchors American capital-markets leadership for the next generation. The PCAOB sits at the assurance

¹⁶12 U.S.C. § 5903 (requirements for issuing payment stablecoins, including monthly disclosure of reserve composition under § 5903(a)(1)(C); monthly examination of reserve composition reports by a registered public accounting firm under § 5903(a)(3); and operational, compliance, and information technology risk management requirements under § 5903(a)(4)).

¹⁷See supra note 3 (Auditchain submissions to the FDIC, OCC, NCUA, and SEC describing the Blockchain Network Participation disclosure framework).

layer of that architecture. The 2026–2030 strategic plan is the moment at which that position is either consolidated or conceded.

We respectfully urge the Board to lead. Adopt the CEAOB harmonization recommendation as a near-term standard-setting priority. Commit at the strategic level to the audit transformation that machine-readable disclosure makes possible. Anticipate the digital asset audit engagements that the GENIUS Act has already imposed by statute and the CLARITY Act will soon extend. The audit transformation that follows will streamline the audit process for registered firms, supercharge audit oversight by the Board and adjacent regulators, and make American capital markets the envy of the world for the next ninety years. The PCAOB has the authority. The regulatory moment makes the case. The opportunity to lead will not return on these terms.

We appreciate the opportunity to comment and look forward to continued engagement with the Board on the development of the 2026–2030 strategic plan and the standard-setting agenda that supports it.

Respectfully submitted,

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