

# Pre-Reliance Preparation Matrix (PRPM)

## DOCUMENT 37: PRE-RELIANCE PREPARATION MATRIX (PRPM) v2.0

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### I. MATRIX ESTABLISHMENT AND PURPOSE

#### 1.1 Constitutional Foundation

The Pre-Reliance Preparation Matrix (PRPM) establishes deterministic readiness requirements institutions must satisfy before achieving MW Infrastructure Stack reliance status. PRPM operates as a comprehensive qualification framework ensuring only adequately prepared institutions enter the MW ecosystem, protecting both entering institutions and the existing reliant network from premature participation creating systemic risks.

PRPM eliminates institutional failures stemming from inadequate preparation. Experience across regulatory regimes demonstrates that unprepared institutions generate disproportionate compliance violations, create ecosystem instability, and ultimately fail at substantial cost to all stakeholders. PRPM prevents such failures through rigorous pre-certification preparation verified through objective testing rather than self-assessment.

The Matrix derives authority from MW Canon (MW-Omega+++++) operating as mandatory gateway controlling ecosystem entry. No institution bypasses PRPM regardless of size, sophistication, reputation, or external credentials. Attempted circumvention through false preparation claims constitutes fraud triggering permanent disqualification plus criminal referral.

#### 1.2 Preparation Philosophy

Six principles govern: competence before certification (demonstrate capability before receiving certification, not through post-certification failures); objective verification (testing validates claims ?? no reliance on self-assessment); comprehensive readiness (financial, technical, governance, and cultural dimensions ?? no single-axis preparation); progressive complexity (advance through stages building capability systematically); failure tolerance in preparation (training environment permits mistakes without ecosystem consequences); and investment requirement (meaningful preparation investment signals commitment and filters casual applicants).

#### 1.3 Scope

Universal application: new institutions (complete PRPM); existing institutions adding authorities (incremental PRPM); post-revocation institutions (enhanced PRPM); merger/acquisition entities (consolidated PRPM). No exemptions for governmental entities, systemically important institutions, or grandfather provisions.

#### 1.4 Relationship to MW Canon & Coordinate Documents

Document 32 (GCRA): PRPM is the mandatory gateway to GCRA certification. No institution receives GCRA certification without completing PRPM.

Document 33 (RIX): Institutions completing PRPM become eligible to transact on the RIX exchange. PRPM qualification is a prerequisite for RIX participant status.

Document 7 (IRUA): PRPM preparation includes IRUA-specific readiness for institutions seeking reliance network participation.

Document 26 (AFIHS): Technical preparation standards align with AFIHS cryptographic requirements (SHA3-512, Ed25519).

Legal Framework: Securities regulatory qualification analogy (SEC/FINRA Series examinations, FCA authorization). Banking charter application standards (OCC, state banking department). Professional licensing examination frameworks. Delaware DGCL for entity operations. ICC arbitration (Zurich) per IATA for disputes.

## II. WHY PRPM EXISTS

The Unprepared Institution Problem: The most expensive failure in any certification ecosystem is admitting an institution that isn't ready. An unprepared institution certified by GCRA creates cascading risks: it fails compliance audits (consuming GCRA enforcement resources), generates conflicts requiring CRM resolution (consuming Committee resources), produces unreliable certifications that other institutions rely upon (damaging IRUA network integrity), and eventually loses certification (creating market disruption as counterparties scramble to replace a failed reliance partner).

Consider the cost sequence: A \$500M asset manager seeks GCRA certification without adequate preparation. It receives certification (because without PRPM, there is no systematic readiness verification). Within 6 months, it fails its first compliance audit ?? the capital allocation system it hastily deployed cannot produce the deterministic audit trails GCRA requires. GCRA enforcement initiates remediation requiring \$200,000 in consultant fees and 6 months of enhanced monitoring. During that period, three institutions that relied on the asset manager's GCRA certification discover the compliance failure and must reassess their own reliance positions ?? each reassessment costs \$50,000-\$100,000 in legal and compliance analysis. The asset manager ultimately fails remediation and loses certification, triggering counterparty notifications to 12 institutions that relied on its certification. Total ecosystem cost: approximately \$1M-\$2M in direct costs, plus immeasurable reputational damage to GCRA's certification credibility.

PRPM prevents this entire cascade. The asset manager undergoes 16 months of structured preparation, discovers during Phase Two that its capital allocation system cannot produce deterministic audit trails, remediates the deficiency before entering the ecosystem, and either enters fully prepared or decides that MW certification isn't worth the investment. Either outcome is vastly cheaper than the post-certification failure sequence.

The Network Contamination Problem: MW's institutional reliance architecture (Document 7 IRUA) means that each institution's certification status affects every institution that relies on it. A single unprepared institution entering the network doesn't just create problems for itself ?? it creates problems for every institution in its reliance chain. If Institution A relies on Institution B's GCRA certification, and Institution B was inadequately prepared and fails, Institution A must now question whether its own reliance was justified.

This network contamination effect means that ecosystem entry standards aren't just about protecting the entering institution ?? they're about protecting every existing participant. PRPM serves the same function as a quarantine protocol: ensuring that new entrants don't introduce systemic risks that propagate through the reliance network.

The Adverse Selection Problem: Without rigorous preparation requirements, MW certification attracts two populations: genuinely committed institutions that would prepare adequately regardless, and opportunistic institutions seeking the commercial benefits of certification without the operational investment. The opportunistic institutions dilute certification value ?? if the market learns that some GCRA-certified institutions aren't genuinely prepared, the certification signal weakens for all certified institutions.

PRPM eliminates adverse selection through its investment requirement. The 16-month preparation pathway, the financial commitment (preparation typically costs \$200,000-\$500,000 for mid-tier institutions), and the comprehensive testing deter institutions that aren't genuinely committed to MW compliance. This self-selection mechanism ensures that institutions entering the ecosystem have both the capability and the commitment for sustained participation.

The Regulatory Precedent Problem: Every major regulatory framework that has endured ?? SEC registration, banking charters, medical licensing, professional engineering certification ?? requires demonstrated competence before granting the credential. Systems that grant credentials without competence verification inevitably suffer credibility crises when credentialed participants fail publicly. PRPM follows established regulatory precedent: demonstrate readiness first, receive the credential second.

The Timing Problem: Without PRPM, institutions face a dangerous gap between certification and competence. They receive GCRA certification on Day 1 but may not achieve genuine compliance capability until Day 180 ?? during which 6-month gap, other institutions rely on their certification as evidence of capability that doesn't yet exist. The reliance network operates on the assumption that certification = competence, and every day that assumption is false creates systemic risk.

PRPM eliminates this gap entirely. By the time an institution receives certification, it has already operated its compliance systems for months during Phase 3 (process implementation) and Phase 4 (testing). The certification date marks the formal recognition of competence that already exists ?? not the beginning of a competence development journey. Other institutions relying on the certification can do so with confidence that the certified institution has demonstrated, not merely claimed, its capability.

The Cost-Benefit Calibration Problem: Preparation costs money ?? \$200,000-\$500,000 for mid-tier institutions over 16 months. This investment must be justified by the value of MW certification. PRPM's rigor actually increases certification

value: because every certified institution has passed rigorous preparation, the certification signal is strong. A GCRA certification obtained through PRPM means the institution genuinely possesses deterministic capital allocation capability â?? not merely that it applied and paid a fee.

This high-signal property creates a positive feedback loop: institutions invest in preparation because the resulting certification is valuable, and the certification is valuable because institutions invest in preparation. Weakening PRPM preparation requirements would reduce certification value, which would reduce institutional willingness to invest in preparation, which would further reduce certification value â?? a death spiral that PRPM's permanent rigor prevents.

### III. PREPARATION DIMENSIONS

#### 3.1 Financial Preparation

**Capital Adequacy:** Institutions demonstrate financial capacity sustaining MW compliance across three tiers calibrated to institutional scale:

Tier One institutions (\$10M-\$100M AUM): \$1M minimum liquid capital. These institutions typically seek single-authority certification (GCRA or IRUA alone) and face compliance costs of \$100K-\$300K annually. The \$1M minimum ensures they can absorb two full years of compliance costs without operational disruption even under adverse revenue scenarios.

Tier Two institutions (\$100M-\$1B AUM): \$5M minimum liquid capital. These institutions typically seek multi-authority certification and face compliance costs of \$300K-\$1M annually. The \$5M minimum provides the same two-year adverse-scenario buffer at their operational scale.

Tier Three institutions (\$1B+ AUM): \$25M minimum liquid capital. These institutions seek comprehensive MW certification (multiple authorities plus GCRA) and face compliance costs of \$1M-\$5M annually.

**Capital quality:** liquid assets only â?? cash, government securities, investment-grade corporate bonds (rated BBB/Baa3 or above by two major agencies). Exclusions: illiquid assets (real estate, private equity, restricted securities), restricted funds (pledged collateral, regulatory reserves), and contingent capital (committed credit facilities, insurance receivables).

**Verification:** Big Four or equivalent audited financial statements; direct bank confirmations; independent asset quality assessment. **Ongoing:** quarterly capital reporting with automatic monitoring; breach of minimum triggers 30-day cure period; failure to cure triggers certification review.

**Compliance Budget:** Detailed 3-year projection with line-item budgets per applicable authority (GCRA compliance costs, IRUA participation costs, GEAA certification costs, each separately). **Reserve allocation:** minimum 15% of total compliance budget reserved for unexpected needs (new authority requirements, emergency remediation, conflict resolution costs). **Board-approved commitment documentation with CFO attestation.**

**Financial Sustainability:** Revenue projections demonstrating compliance costs remain below 10% of operating budget across all projection years. **Stress testing** under three scenarios: base case (projected revenue), moderate stress (20% revenue decline), severe stress (40% revenue decline). **Liquidity analysis** confirming payment capacity through severe stress without asset liquidation. **Business model viability assessment** confirming MW certification costs don't compromise core operations.

**Financial Governance:** CFO or equivalent financial officer with compliance budget authority. Board finance committee with quarterly compliance cost review. Internal financial controls documented per GAAP standards. External audit relationship with Big Four or equivalent firm confirmed.

**Financial Testing:** Hypothetical compliance cost allocation exercise (institution presented with realistic multi-authority cost scenario and must demonstrate budgeting capability). **Budget variance analysis** (institution explains how it would respond to 30% cost overrun). **Financial reporting accuracy verification** (auditor confirms institution's financial systems produce reliable compliance cost data). **Capital planning competency** (institution demonstrates 5-year capital plan incorporating escalating MW compliance costs).

#### 3.2 Technical Preparation

**Core Infrastructure:** Production-grade server infrastructure with demonstrated 99.9% uptime capability (measured over minimum 90-day pre-certification monitoring period). Redundant systems preventing single points of failure â?? at minimum, dual data center or cloud availability zone deployment. Disaster recovery with maximum 4-hour RTO (recovery time objective) and 15-minute RPO (recovery point objective), tested through actual failover execution.

**Security Infrastructure:** Next-generation firewall with IDS/IPS. **Encryption:** AES-256 minimum for data at rest, TLS 1.3 for data in transit. Per Document 26 AFIHS: SHA3-512 hashing capability for all MW document verification, Ed25519 key generation and signature verification, FIPS 140-2 Level 3+ HSM for cryptographic key custody with 2-of-3 multi-signature for

critical operations. Multi-factor authentication for all administrative access. SIEM with 24/7 monitoring capability. DDoS mitigation (minimum 1 Tbps absorption capacity).

**Database Systems:** Production database with capacity for 5Ã? current institutional scale (growth headroom). Immutable audit trail â?? append-only logging with cryptographic chaining (each log entry references SHA3-512 hash of previous entry). Data retention meeting MW permanence requirements per Document 22 DCPA (minimum 25-year retention for certification records, minimum 7-year for transaction records). Query performance supporting real-time compliance verification (sub-second response for standard queries).

**Integration Capabilities:** REST API development and consumption with Ed25519 authentication per Document 33 RIX specifications. Webhook implementation for real-time notifications from MW authorities. Data transformation between institutional formats and MW standard formats per Document 26. Version control (Git-based) and change management with documented approval workflows.

**Technical Governance:** CTO or equivalent with MW technical compliance responsibility. CISO with direct board reporting line. Technical operations team with 24/7 coverage capability (minimum 3 staff for rotation). Vendor management framework ensuring all technology providers meet MW security and reliability standards.

**Technical Testing:** Load testing at 150% projected peak capacity with all performance metrics within specification. Failover testing executing actual disaster recovery switchover (not tabletop exercise) with measured RTO and RPO. Security penetration testing by CREST-certified or equivalent ethical hackers covering external perimeter, internal network, application layer, and social engineering vectors. MW API integration testing against complete sandbox environment covering all endpoints the institution will use in production.

**Competency Assessment:** Technical staff certification in relevant domains (cloud platforms, database administration, cryptographic systems, API development). Architecture documentation review by independent technical assessor. Code quality assessment for custom-developed compliance systems (static analysis, code review, test coverage metrics).

Technical debt evaluation with remediation plan for identified issues.

### 3.3 Governance Preparation

**Board Requirements:** Minimum 3 directors (institutions under \$100M AUM) or 5 directors (over \$100M), with majority independence (non-management, non-affiliated, no material business relationships). Compliance committee established with quarterly meeting cadence minimum, dedicated charter, and authority to engage external experts. Documented expertise: at minimum one director with financial regulatory experience, one with technology/cybersecurity background, and one with legal/compliance credentials.

**Board Responsibilities:** MW compliance oversight explicitly designated in corporate charter or board resolution. Quarterly compliance reporting from CCO to board (minimum â?? monthly for institutions under enhanced monitoring). Annual compliance budget approval with board resolution documenting deliberation. All certification decisions (application, renewal, additional authorities, withdrawal) escalated to board level.

**Board Training:** MW framework overview (minimum 4-hour session for all directors). Fiduciary obligations regarding compliance with specific attention to personal liability for compliance failures. Escalation protocols and crisis management procedures. Annual refresher training mandatory.

**Management Structure:** Chief Compliance Officer â?? dedicated role (not combined with other functions), senior leadership level (direct CEO reporting or equivalent), independent board reporting line, adequate staffing (minimum 1 FTE per authority sought), budget authority for compliance initiatives, and professional credentials (CCEP, CRCM, or equivalent). Compliance Committee â?? cross-functional (operations, technology, legal, finance), monthly meetings with documented minutes, escalation authority to board. CEO with designated MW accountability, clear accountability matrix, compliance-aligned performance incentives, and documented succession plan.

**Documentation:** Corporate charter/governing documents; board minutes evidencing compliance oversight (minimum 12 months history); organizational chart; delegation of authority matrix; conflict-of-interest policies; whistleblower protections with independent reporting channel. Policy framework: compliance manual covering all applicable MW authorities with specific sections for each; incident response procedures (security breach, compliance violation, regulatory inquiry); audit and monitoring protocols; document retention meeting Document 22 DCPA standards; employee training requirements and tracking.

**Governance Testing:** Director knowledge examination (MW framework, authority requirements, conflict resolution, fiduciary obligations â?? 80% minimum pass). Simulated compliance crisis (board presented with realistic multi-authority compliance failure scenario and must demonstrate appropriate response within 60-minute exercise). Budget prioritization exercise (board allocates limited resources across competing compliance needs per ROD hierarchy). CCO competency examination

(85% minimum â?? deeper than director exam, covering operational compliance procedures). Policy implementation verification by external assessor. Escalation protocol testing (tabletop exercise confirming information flows correctly from operations to CCO to board).

### 3.4 Cultural Preparation

Determinism Mindset: Documented organizational commitment to rules-based decision-making. Elimination of "management discretion" and "professional judgment" from compliance-relevant policies â?? replaced with objective criteria producing deterministic outcomes. Exception approval processes with documented objective criteria (no "CEO can approve exceptions at discretion"). Complete audit trails for all significant decisions including the inputs, the rule applied, and the output.

Process Orientation: Standardized procedures for all routine compliance activities. Workflow documentation with automation where feasible. Quality control checkpoints at each process stage. Continuous improvement framework (regular process reviews, deficiency tracking, improvement implementation).

Transparency: Internal â?? open communication about compliance challenges without reprisal; non-punitive error reporting (mistakes identified early are learning opportunities; mistakes concealed are violations); lessons learned documentation and sharing across departments; accessible compliance information for all employees. External â?? willingness to publish compliance metrics to MW registry; regulatory cooperation including proactive disclosure; stakeholder communication protocols; public accountability acceptance.

Cultural Assessment: Leadership interviews evaluating values alignment, historical decision patterns, and change readiness. Employee surveys measuring workforce compliance understanding, perceived leadership commitment, reporting environment safety, and training effectiveness (75%+ positive indicators required). Behavioral evidence review: historical compliance track record in prior regulatory regimes; response to past violations (correction versus concealment); investment patterns in compliance infrastructure; voluntary compliance enhancements beyond minimum requirements.

## IV. PREPARATION PATHWAYS

### 4.1 Standard Pathway (16 Months)

The standard pathway is designed for institutions entering MW certification for the first time without prior regulatory certification from a recognized body. Most institutions â?? approximately 70% of applicants â?? follow this pathway.

Phase 1 â?? Self-Assessment (Months 1-2): Institution completes the comprehensive readiness questionnaire covering all four preparation dimensions (financial, technical, governance, cultural). The questionnaire is not a pass/fail instrument â?? it's a diagnostic tool identifying gaps between current institutional capability and PRPM requirements. Deliverables: gap analysis document identifying specific deficiencies per dimension; preparation project plan with task dependencies and resource assignments; budget proposal with line-item costs for each remediation activity; and timeline with measurable milestones at 30-day intervals. Success criteria: realistic gap identification (not minimizing deficiencies to shorten timeline); achievable timeline with appropriate resource allocation; senior leadership approval documented through board resolution; and board authorization of preparation investment with designated budget.

Phase 2 â?? Infrastructure Development (Months 3-8): The longest phase because infrastructure deployment â?? both technical and organizational â?? cannot be compressed below a minimum quality threshold. Technical: deploy or upgrade production server infrastructure, security systems, database architecture, and integration capabilities to PRPM specifications. Governance: establish or formalize board compliance committee, CCO role, compliance committee, and reporting structures. Documentation: develop comprehensive policy manual, incident response procedures, audit protocols, and training curricula. Training: initial staff capability building â?? compliance team receives authority-specific training, technical team receives MW integration training, leadership receives framework overview.

Deliverables: functional technical infrastructure passing preliminary testing (not full certification testing â?? preliminary confirms basic functionality). Board-approved governance documentation suite. Complete policy manual reviewed by external legal counsel. Trained compliance team with basic competency in all applicable MW authorities.

Success criteria: infrastructure passes preliminary testing (60% of full threshold â?? sufficient to demonstrate capability, with full threshold testing in Phase 4). Governance documents approved by board and reviewed by external counsel. Policies confirmed by legal advisor as substantively complete. Staff demonstrates basic competency through initial assessments (70% of full threshold).

Phase 3 â?? Process Implementation (Months 9-12): Transition from "built" to "operational." Compliance workflows activated using real (or realistic simulated) institutional data. MW system integration tested with sandbox endpoints. Audit trail and monitoring systems activated and confirmed to capture required data. Full-scale staff training with competency

certification for all key personnel.

Deliverables: operational compliance processes executing reliably; integrated systems with completed test transactions through MW sandbox; active monitoring dashboards displaying real-time compliance metrics; and certified workforce with all key personnel passing competency assessments. Success criteria: processes execute without material errors over 30-day evaluation period; systems integrate successfully with all applicable MW sandbox endpoints; monitoring captures 100% of required data elements; and all designated personnel pass authority-specific competency assessments at 80%+ threshold.

Phase 4 ?? Testing & Verification (Months 13-15): Full-threshold testing across all four dimensions by independent third-party assessors. Financial testing (capital verification, budget assessment, controls testing per Section V.1). Technical testing (performance, security, integration, reliability per Section V.2). Governance testing (board, management, process, culture per Section V.3). Any deficiencies identified receive targeted remediation with re-testing. Final preparation documentation compiled into comprehensive portfolio.

Deliverables: test results across all assessments; third-party verification reports; remediation evidence for any identified deficiencies; and complete preparation portfolio organized per PRPM specifications. Success criteria: all tests passed at required thresholds; independent verification confirms readiness; no material deficiencies remaining after remediation; documentation complete and organized.

Phase 5 ?? Certification Application (Month 16): Formal application submission with complete documentation portfolio. Comprehensive readiness examination (Section V.4). Fee payment per Document 5 pricing. Application deemed complete or returned with specific deficiency identification. If complete: examination scheduled within 30 days. Standard pathway duration: 16 months typical, 12 months minimum (for institutions with substantial existing infrastructure), 24 months maximum (extended only with documented extraordinary circumstances).

#### 4.2 Accelerated Pathway (6 Months)

For institutions with demonstrated regulatory compliance excellence in recognized regimes. Eligibility prerequisites: existing certification from SEC, FCA, BaFin, MAS, OSFI, or equivalent Tier 1 regulator; demonstrated compliance track record (minimum 3 years without material violations); substantial existing technical infrastructure meeting at least 70% of PRPM specifications; and proven governance culture with established compliance function.

Application: petition with detailed justification; evidence of prerequisite satisfaction; proposed 6-month timeline; commitment to 50% increased preparation budget (reflecting compressed timeline intensity). Benefits: compressed timeline, consolidated testing phases, parallel rather than sequential activities, priority scheduling for assessments.

Enhanced requirements: 95% pass thresholds (versus 85% standard ?? accelerated institutions have existing capability and should exceed standard thresholds). Simultaneous rather than sequential dimension testing. Weekly progress reporting to preparation assessor. Immediate intervention for any delay exceeding 5 days.

Timeline: Month 1 (self-assessment + gap analysis focusing on MW-specific requirements not covered by existing regulatory compliance); Months 2-3 (infrastructure development ?? primarily integration with MW systems since core infrastructure already exists); Months 4-5 (process implementation and integration testing); Month 6 (testing, verification, and certification application simultaneously).

#### 4.3 Incremental Pathway (6 Months)

For institutions already MW-certified under one or more authorities seeking to add additional authorities. Foundation recognition: full credit for existing MW compliance infrastructure, governance, technical systems, and cultural alignment. No re-testing of dimensions already verified through current certification.

Focus: authority-specific unique requirements (each authority has requirements not shared with others); integration between new authority requirements and existing compliance framework (Document 34 ROD and Document 36 CRM familiarity for conflict management); incremental infrastructure enhancements (additional API endpoints, expanded audit trail coverage, new reporting requirements); and targeted staff training on the new authority's specific standards.

Timeline: Month 1 (gap analysis comparing existing certified capabilities against new authority requirements); Months 2-4 (incremental development addressing identified gaps); Month 5 (integration testing confirming new authority compliance doesn't disrupt existing authority compliance); Month 6 (certification application for new authority).

#### 4.4 Remediation Pathway (24+ Months)

For institutions re-entering after certification revocation ?? the most rigorous pathway reflecting the demonstrated risk these institutions represent. Root cause analysis mandatory: external consultant (not the institution's regular advisor) must conduct independent investigation of revocation causes. Board-level review with documented accountability ?? individual directors must acknowledge their oversight failure. Detailed corrective action plan addressing every contributing factor.

Enhanced governance: board composition changes mandatory if governance failures contributed to revocation (minimum replacement of compliance committee chair). Compliance leadership replacement if CCO was in role during the failure period. Strengthened oversight with monthly board compliance reporting (versus quarterly standard). Increased compliance committee authority including veto power over operational decisions affecting compliance.

Cultural transformation: documented leadership commitment (CEO public acknowledgment of failure and corrective commitment). Complete workforce retraining. Incentive structure realignment with compliance performance carrying minimum 25% weight in all management compensation.

Probationary provisions: minimum 24-month preparation (no acceleration); 3-year enhanced post-certification monitoring; reduced violation tolerance (first violation triggers review rather than warning); public disclosure of revocation history in all MW registry entries. Restrictions: 2-year minimum waiting period after revocation date; permanent disqualification for fraud-based revocations (no re-entry ever); maximum 2 re-entry attempts (third revocation = permanent disqualification); enhanced fees reflecting increased risk and oversight costs (2-3 times standard fees).

## V. TESTING AND VERIFICATION

### 5.1 Financial Testing

Capital verification: Big Four or equivalent third-party audit confirmation of capital levels meeting tier-specific thresholds. Direct bank statement and account confirmations (not institution-prepared summaries). Independent asset quality assessment and appraisal for any non-cash liquid assets. Liquidity stress testing under three scenarios (base, moderate stress at 20% revenue decline, severe stress at 40% decline) confirming capital adequacy maintained throughout.

Budget assessment: line-item review of compliance budget allocations against industry benchmarks (comparable institutions of similar size and authority profile). Reserve adequacy evaluation confirming 15% minimum reserve. Multi-year projection reasonableness assessment by independent financial advisor. Sensitivity analysis demonstrating budget adequacy under cost escalation scenarios (15% and 30% compliance cost increase).

Financial controls testing: audit trail completeness for all financial transactions related to compliance expenditures. Segregation of duties verification (no single individual can authorize, execute, and record compliance payments). Approval authority validation (all expenditures above \$10,000 require dual authorization). Reconciliation process examination confirming monthly reconciliation of compliance accounts.

Pass thresholds: capital at 120% of applicable tier minimum (the 20% buffer ensures resilience); compliance allocation minimum 5% of operating budget (institutions allocating less than 5% historically underinvest in compliance); zero material control weaknesses identified by assessor; positive compliance funding in all 3 projection years including under moderate stress scenario.

### 5.2 Technical Testing

Performance testing: load at 150% of projected peak capacity with all response times within specification (<1 second for 95th percentile). Concurrent user validation at 2-3 times current maximum. Data throughput capacity confirmation at 3-4 times current volume (growth headroom). Sustained load testing over 72-hour period confirming no performance degradation.

Security testing: vulnerability assessment by CREST-certified or equivalent ethical hackers. External perimeter penetration testing. Internal network penetration testing (assumed compromised endpoint scenario). Application-layer testing for OWASP Top 10 vulnerabilities. Social engineering susceptibility testing (phishing simulation, pretexting). Incident response simulation testing actual response procedures under realistic attack scenario.

Integration testing: API connectivity verified against all MW endpoints the institution will use in production. Data format compliance verified for all submission and receipt data types per Document 26 AFIHS. Error handling and retry logic validated under network disruption simulation. Ed25519 authentication testing confirming key generation, signature creation, and signature verification all function correctly.

Reliability testing: actual failover execution (not tabletop) measuring real RTO and RPO against 4-hour and 15-minute targets respectively. Disaster recovery full execution with measured recovery time. Backup restoration verification confirming data integrity after restoration. MTBF assessment based on 90-day monitoring period.

Pass thresholds: all performance tests pass at 150% load with no degradation over 72 hours; zero critical or high vulnerabilities remaining unaddressed (medium/low acceptable with documented remediation plan); 100% API test success rate across all endpoints; 99.9% uptime demonstrated over 90-day monitoring period.

### 5.3 Governance Testing

Board assessment: director knowledge examination covering MW framework, applicable authorities, conflict resolution (ROD/CACAP/CRM), and fiduciary obligations (80% minimum pass per director, all directors must pass). Board meeting minutes review confirming compliance focus in at least 75% of meetings over preceding 12 months. Committee functionality evaluation confirming quarterly meetings with substantive agenda and documented actions. Independent director verification through conflict-of-interest declarations and background screening.

Management assessment: CCO certification examination (85% minimum) covering operational compliance procedures, authority-specific requirements, enforcement and remediation processes, and reporting obligations. Policy manual quality review by external legal counsel confirming substantive completeness, legal accuracy, and practical implementability. Organizational structure analysis confirming appropriate reporting lines and independence. Delegation of authority validation confirming documented authority limits.

Process assessment: workflow documentation completeness review (all compliance processes documented with inputs, steps, outputs, and exception handling). Control effectiveness testing through sample transaction walkthroughs. Audit trail functionality verification confirming complete, immutable, and searchable compliance records. Incident response simulation with realistic scenario execution and measured response time.

Cultural assessment: employee survey results with minimum 75% positive indicators across compliance culture dimensions (understanding, leadership commitment, reporting safety, training effectiveness). Leadership interview evaluations by trained organizational psychologist or equivalent. Historical decision-making review examining past 3 years of institutional decisions for consistency with deterministic principles. Values alignment verification through behavioral evidence rather than stated commitments.

Pass thresholds: all directors pass knowledge exam; all key personnel certified; zero critical control deficiencies; positive culture assessment across all indicators. Any threshold failure triggers targeted remediation with 60-day re-testing window.

#### 5.4 Comprehensive Readiness Examination

Final integrated examination across four weighted components:

Written Examination (4 hours, 25% weight): MW constitutional framework knowledge. Authority-specific requirement understanding for all authorities the institution is seeking. Conflict resolution competency ?? practical application of ROD hierarchy, CACAP prevention mechanisms, and CRM lookup procedures. Compliance strategy and planning.

Practical Simulation (8 hours, 40% weight ?? the heaviest component because practical competence matters most): Real-time compliance scenario response across multiple simultaneous authority obligations. Multi-authority coordination demonstration including ROD-compliant prioritization. Crisis management execution (simulated security breach triggering GCRA, GEAA, and IRUA obligations simultaneously). Documentation and reporting production under time pressure.

Oral Examination (2 hours, 20% weight): Leadership commitment verification through direct questioning of CEO and CCO. Strategic understanding of MW ecosystem participation and long-term compliance investment. Ethical reasoning evaluation through scenario-based discussion. Long-term sustainability planning.

Documentation Review (ongoing, 15% weight): Complete preparation portfolio quality and organization. Policy manual comprehensiveness and accuracy. Technical documentation adequacy. Governance document compliance.

Pass requirements: 85% overall minimum; no component below 75%; all designated critical elements satisfied (specific elements marked "critical" must be individually passed regardless of overall score); unanimous examiner panel approval. Independent examination board with standardized materials, rubrics, and recorded sessions. Appeal process: 15-day filing window, independent review panel, 30-day decision.

## VI. PREPARATION SUPPORT INFRASTRUCTURE

### 6.1 Official Resources

Documentation: complete handbook (200+ pages), authority-specific guides, technical specifications, governance templates. Training: online LMS, instructor-led workshops, webinar series, preparation courses. Assessment: self-assessment questionnaires, practice exams, gap analysis templates, progress dashboards. Technical: API documentation with sandbox environment, reference implementations, integration testing tools, security frameworks. Consultation: preparation planning, architecture review, governance assessment, cultural evaluation.

### 6.2 Approved Consultants

Approval: rigorous qualification, MW expertise demonstration, track record verification, annual recertification. Categories: general (full-service), technical infrastructure, governance/compliance, financial planning. Obligations: approved methodologies, accurate representation, confidentiality, quality maintenance. Limitations: cannot guarantee certification,

cannot provide exam content, cannot circumvent requirements, cannot substitute for institutional commitment. Public directory with specialization, experience, ratings, and geographic coverage.

#### 6.3 Peer Networks

Regional cohorts meeting quarterly; online forums; annual conference; mentorship matching with certified institutions. Benefits: shared learning, resource pooling, mutual support, best practice exchange. Governance: MW facilitation, code of conduct, confidentiality agreements, anti-collusion monitoring. Limitations: no exam sharing, no standard-lowering coordination.

#### 6.4 Financial Assistance

Scholarships: partial fee waivers for qualifying small institutions (<\$25M AUM); infrastructure grants; training subsidies; consultant cost sharing. Eligibility: asset size below threshold, non-profit/public benefit status, community mission, financial need. Limitations: no reduction in substantive requirements; no certification guarantee; limited availability; competitive application. Obligations: progress reporting, success metrics, community benefit, knowledge sharing.

## VII. FINAL PROVISIONS & CANONICAL STATUS

7.1 Temporal Validity ?? Permanent. No amendments weakening preparation requirements, reducing testing rigor, or compromising readiness verification.

7.2 Interfaces ?? Documents 7, 26, 32, 33, 34, 35, 36. All 17 Layer-3 authorities.

7.3 Governing Law ?? Delaware DGCL. ICC arbitration (Zurich). New York Convention.

7.4 Implementation ?? All preparation infrastructure deployed prior to effectiveness: resources published, examination materials validated, consultant process operational, support systems functional.

7.5 Amendment Restrictions ?? Cannot: reduce capital thresholds; eliminate any preparation dimension; allow self-assessment to replace objective testing; create exemptions for any institution category; reduce examination pass thresholds; or allow accelerated pathway without demonstrated regulatory credentials.

#### 7.6 Effective Date & Canonical Declaration

Effective upon: GitHub issuance, Zenodo archival with DOI, SHA3-512 hash publication, blockchain attestation (Ethereum, Bitcoin, Arweave), founder signature.

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