

# Public Investors Arbitration Bar Association

March 16, 2012

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Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-1090

**Re: SR-FINRA-2012-012**  
**Proposed Rule Change To Amend FINRA's Customer and Industry Codes of Arbitration Procedure to Raise the Limit for Simplified Arbitration from \$25,000 to \$50,000**

Dear Ms. Murphy:

Thank you for the opportunity to comment on the above-referenced proposal to amend FINRA's Customer and Industry Codes of Arbitration Procedure to raise the limit for simplified arbitration to \$50,000. I write on behalf of the Public Investors Arbitration Bar Association ("PIABA"). PIABA is supportive of the new rule, which we believe increases the efficiency of FINRA arbitration and better serves aggrieved investors.

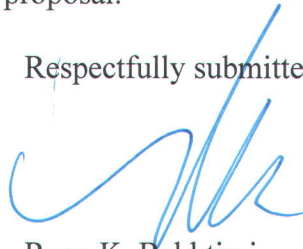
PIABA is a bar association comprised of attorneys who represent investors in securities arbitrations. Since its formation in 1990, PIABA has promoted the interests of public investors in securities and commodities arbitration forums. Our members and their clients have a strong interest in the FINRA arbitration rules.

We are pleased that FINRA has recognized the need to update its Codes to encompass a greater percentage of cases for simplified arbitration. The \$25,000 threshold instituted in 1998 is presently too low. As noted in the rule proposal, the current threshold captures a mere 10 percent of cases, where it once covered 21 percent of all cases filed with FINRA. The decline in cases subject to simplified arbitration can be countered by raising the threshold to \$50,000.

PIABA believes that the proposed rule would lead to increased efficiency by allowing more claims to be resolved through simplified arbitration. We have often seen investors who have been financially ruined and have difficulty paying day to day bills. The increased flexibility of the proposal and decreased arbitration cost burden is a direct benefit to such investors. Increasing the amount of claims captured by simplified arbitration from 10 percent to 17 percent will necessarily increase efficiency. A decrease in the cost burden is a benefit to all participants in the FINRA forum.

PIABA supports the proposal.

Respectfully submitted,



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