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July 27, 2016

Via Email Only

rule-comments@sec.gov

Office of the Secretary
Securities and Exchange Commission
100 F Street NE
Washington, D.C. 20549-1090

Re: **SR-FINRA-2016-022**
Notice of Filing of Proposed Rule Change to Amend Rule 12403 (Cases with Three Arbitrators) of the Code of Arbitration Procedure for Customer Disputes Relating to the Panel Selection Process in Arbitration

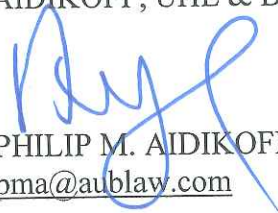
To the Office of the Secretary:

I am a partner at Aidikoff, Uhl and Bakhtiari, a law firm devoted to the representation of individuals and institutions in disputes with the Financial Services Industry. I am a former Chairman of FINRA's National Arbitration and Mediation Committee (NAMC), a former President of the Public Investors Arbitration Bar Association (PIABA), and I recently served on the FINRA Dispute Resolution Task Force.

I am writing to comment on the above-referenced rule proposal. Because the all-public panel option has been increasingly popular with public customers, the current structure has the parties choosing three arbitrators from two lists of ten each (Chair and Public). The proposed rule increases the list of Public Arbitrators from ten to fifteen and also increases the number of strikes a party may exercise on that list from four to six. The proposed rule has the practical effect of decreasing the likelihood of a cram down appointment, which is an important step in providing more choice for all concerned. I urge the Commission to approve the proposed rule on an expedited basis.

Very truly yours,

AIDIKOFF, UHL & BAKHTIARI


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