

AIDIKOFF, UHL & BAKHTIARI

9454 WILSHIRE BOULEVARD
SUITE 303
BEVERLY HILLS, CALIFORNIA 90212
WWW.SECURITIESARBITRATION.COM

PHONE (310) 274-0666
FAX (310) 859-0513

PHILIP M. AIDIKOFF
ROBERT A. UHL[§]
RYAN K. BAKHTIARI^{*†‡}

OF COUNSEL
DAVID HARRISON*

*ALSO ADMITTED NEW YORK
†ALSO ADMITTED DISTRICT OF COLUMBIA
‡ALSO ADMITTED TEXAS
§RETIRED FROM FIRM

December 11, 2017

Via Email Only
pubcom@finra.org

Marcia E. Asquith
Office of the Corporate Secretary
FINRA
1735 K Street, NW
Washington, D.C. 20006-1506

Re: FINRA Regulatory Notice 17-34
Non-Attorney Representatives in Arbitration

Dear Ms. Asquith:

I am a partner at Aidikoff, Uhl and Bakhtiari, a law firm devoted to the representation of individuals and institutions in disputes with Wall Street and the financial service industry. I am a past Chair of FINRA's National Arbitration and Mediation Committee (NAMC) and a former President of the Public Investors Arbitration Bar Association (PIABA).

The purpose of this letter is to provide FINRA with comments on the above referenced Regulatory Notice concerning compensated non-attorney representatives. My comments therefore do not reflect other types of non-attorneys that appear in the forum including law school students who are supervised by their clinics and well meaning non-compensated persons.

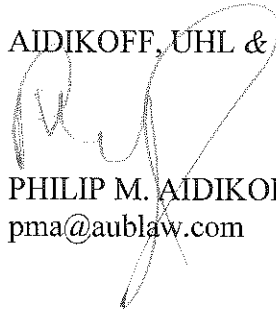
FINRA arbitrations are generally complex and require a familiarity with both the applicable law as well as the rules of the forum. The notion that it is an informal process akin to a small claims court is nonsense. Having practiced in this field for more than twenty-five years, I have encountered numerous examples of customers hiring compensated non-attorney representatives and having their cases mishandled.

Marcia E. Asquith
Re: FINRA Regulatory Notice 17-34
December 11, 2017
Page 2

In addition, non-attorney representatives are not governed by any state bar or ethics rules. In my view, FINRA will be advancing the cause of investor protection by preventing these unqualified people from appearing in the forum.

Very truly yours,

AIDIKOFF, UHL & BAKHTIARI



PHILIP M. AIDIKOFF
pma@aublaw.com

PMA/ls