

AIDIKOFF, UHL & BAKHTIARI

9454 WILSHIRE BOULEVARD

SUITE 303

BEVERLY HILLS, CALIFORNIA 90212

WWW.SECURITIESARBITRATION.COM

PHILIP M. AIDIKOFF
ROBERT A. UHL[§]
RYAN K. BAKHTIARI*†‡
KATRINA M. BOICE[°]

PHONE (310) 274-0666

FAX (310) 859-0513

OF COUNSEL
DAVID HARRISON*
DAVID G. SPIVAK

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

July 2, 2014

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

Re: **SR-FINRA-2014-026**
Self-Regulatory Organizations; Financial Industry Regulatory Authority, Inc.; Notice of Filing of a Proposed Rule Change to Amend the Code of Arbitration Procedure for Customer Disputes and the Code of Arbitration Procedure for Industry Disputes to Increase Arbitrator Honoraria and Increase Certain Arbitration Fees

To The Office of the Secretary:

I am a partner at Aidikoff, Uhl & Bakhtiari, a law firm devoted to the representation of individuals and institutions in disputes with Wall Street and the Financial Services Industry. I am a former president of the Public Investors Arbitration Bar Association (PIABA) and a past chair of FINRA's National Arbitration and Mediation Committee (NAMC). I also served as a member of the Securities Industries Conference on Arbitration (SICA) as well as the SIPC Modernization Task Force.

The purpose of this letter is to support the above referenced rule proposal. As someone who has practiced in the NASD/FINRA forum for more than two decades, there is no question in my mind that the process requires the highest quality of arbitrators possible. FINRA arbitrators are currently paid far less than those who serve in other forums and generally see the value of panel service beyond just the remuneration they receive. That being said, there has been no increase in the arbitrator honoraria for fifteen years and in my view increasing these payments will help retain qualified individuals in the pool as well as helping to recruit new arbitrators. The proposed increases will only affect customer and associated person filing fees in cases where damages exceed \$500,000 and then only minimally.

I urge the Commission to approve this Rule on an expedited basis.

Very truly yours,

AIDIKOFF, UHL & BAKHTIARI


PHILIP M. AIDIKOFF
pma@aublaw.com

PMA/hh