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July 31, 2018

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-2018-026
Proposal to Amend FINRA Rules 12214 and 13214

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 Wall Street and the financial service industry. I am a former President of the Public Investors Arbitration Bar Association (PIABA) and the former Chairman of FINRA's National Arbitration and Mediation Committee (NAMC).

The purpose of this letter is to provide the Securities and Exchange Commission with comments on the above referenced rule proposal. The proposed rule more fairly compensates arbitration Chairpersons for deciding contested subpoenas and orders of production and appearance. The proposal which ends the cap on arbitrator payments for contested subpoenas will also help FINRA maintain the roster by compensating arbitrators for work that they perform. I urge the Commission to approve the proposed rule on an expedited basis.

Very truly yours,

AIDIKOFF, UHL & BAKHTIARI

/s/ Ryan K. Bakhtiari

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