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April 10, 2008

VIA E-MAIL TO: rule-comments@sec.gov

Ms. Nancy M. Morris
Secretary
U.S. Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090

**Re: File Number SR-FINRA-2007-021
Proposal amending Rules 12206 and 12504 of the NASD Customer Code and Rules
13206 and 13504 of the NASD Industry Code to address motions to dismiss**

Dear Ms. Morris:

Deutsche Bank Securities Inc. ("DBSI") appreciates the opportunity to comment on the referenced rule proposals (the "rule proposals") submitted to the Commission by the Financial Industry Regulatory Authority ("FINRA").

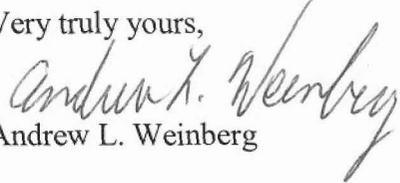
DBSI agrees with the comment letter previously submitted by the Securities Industry and Financial Markets Association ("SIFMA") dated April 7, 2008. While DBSI supports FINRA's efforts to limit spurious and bad-faith dispositive motions, the rule proposals would eliminate a number of circumstances where dispositive motions are appropriate and should be allowed. Accordingly, DBSI urges against the adoption of the rule proposals and supports the proposed changes set forth in Attachment 1 to SIFMA's comment letter.

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Thank you for your consideration.

Very truly yours,


Andrew L. Weinberg