



RBC Wealth Management™

John G. Taft
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April 10, 2008

By EMAIL TO: rule-comments@sec.gov

Ms. Nancy M. Morris
Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

**Re: File No. SR-FINRA 2007-021
Proposal amending Rules 12206 and 12504 of the Customer Cade and Rules
13206 and 13504 of the Industry Code to address Motions to Dismiss**

Dear Ms. Morris:

RBC Wealth Management, a division of RBC Capital Markets Corporation, (formerly known as RBC Dain Rauscher Inc.) (“RBC”) appreciates the opportunity to comment on the above-referenced rule proposals submitted to the Commission by the Financial Industry Regulatory Authority (“FINRA”). By reference, RBC adopts the comment letter submitted to you earlier this week by the Securities Industry and Financial Markets Association (“SIFMA”) sent from Edward G. Turan on behalf of the SIFMA Arbitration Committee, Martha E. Solinger on behalf of the SIFMA Litigation Advisory Committee and Lisa J. Rosenbaum on behalf of the SIFMA Clearing Firms Committee.

While RBC agrees that abusive motion practice must continue to be discouraged, the proposed rule as written will likely prove a disservice to all who engage in resolving their disputes with FINRA’s arbitration process. When properly used, dispositive motions efficiently resolve disputes and should be available to Claimants and Respondents alike. There are numerous situations, many of which are articulated in the SIFMA comment letter, in which a properly timed and supported motion to dismiss saves all parties time and money. RBC urges the Committee to reject the rule as proposed, or, at a minimum, include language to permit the filing of well-supported motions that can

serve to make the arbitration process more efficient and effective.

Thank you for your consideration of RBC's comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. Taft". The signature is fluid and cursive, with the first name "John" being the most prominent.

John Taft
Co-Chairman, Head of US Wealth Management
RBC Capital Markets Corporation

cc: Linda D. Fienberg, President, FINRA Dispute Resolution
George H. Friedman, Executive Vice President, FINRA Dispute Resolution