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October 25, 2010

Via Electronic Filing

Ms. Elizabeth M. Murphy
Secretary
United States Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

RE: SR-FINRA-2010-050
Proposed Rule Change Relating to Online Filing of Arbitration Claims

Dear Ms. Murphy,

The Cornell Securities Law Clinic (the “Clinic”) greatly appreciates the opportunity to offer our support for the recent Financial Industry Regulatory Authority (“FINRA”) proposal to amend Rule 12302 (the “Proposed Rule”) of the Consumer Code of Arbitration Procedure (the “Code”).¹ The Clinic is a Cornell Law School curricular offering that allows law students to provide representation to aggrieved public investors and to provide investment fraud educational outreach to residents of the “Southern Tier” region of upstate New York. *See* <http://securities.lawschool.cornell.edu>.

The Proposed Rule allows claimants to initiate arbitration proceedings by filing all initially required documents electronically through the Online Arbitration Claim Filing system (accessible at www.finra.org). As an alternative, claimants may still elect to submit these documents in hard copy. Prior to the Proposed Rule, claimants could complete only *part* of the arbitration claim filing process electronically; FINRA would not process claims until claimants submitted to FINRA a hard copy of the original signed Submission Agreement, Statement of Claim, FINRA Dispute Resolution Tracking Form, and (until recently) filing fees.

The Clinic supports the Proposed Rule. The Clinic agrees with FINRA’s position that providing claimants with increased electronic filing capabilities “will assist in the efficient administration of arbitrations” and that the Proposed Rule “will enhance the [Code] by making [it] easier to understand and apply.” Rule Proposal at 3-4. The Clinic believes that enabling claimants to file all initial arbitration documents electronically will facilitate access to arbitration

¹ Although FINRA similarly amends Rule 13302 of the Industry Code of Arbitration Procedure, the Clinic takes no position on this change.

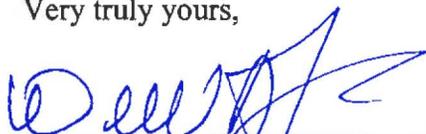
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and will enhance the efficiency of this process. The Clinic has previously supported FINRA's full transition to complete electronic filing in two previous comment letters submitted to FINRA on February 25, 2008 (re: SR-FINRA-2007-042) and December 9, 2009 (re: SR-FINRA-2009-072).

FINRA's regulations must, *inter alia*, protect investors and the public interest. 15 U.S.C. 78o-3(b)(6). Rules that facilitate access to arbitration and expedite the arbitration process support this mandate. Therefore, the Clinic endorses the Proposed Rule.

Thank you again for the opportunity to offer our support for the Proposed Rule.

Very truly yours,



William A. Jacobson, Esq.
Director, Cornell Securities Law Clinic



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