

Subject: File No. SR-FINRA-2010-053
From: J. BOYD PAGE
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I am a senior partner in the law firm of Page Perry, LLC, which represents investors in securities-related litigation and arbitration all over the country.

I am a past member of the National Association of Securities Dealer's ("NASD's") National Arbitration Committee and the NASD's Securities Arbitration Policy Task Force. I have also served on the Advisory Board of the Securities Arbitration Commentator, the Georgia Penny Stock Advisory Committee and the American Arbitration Association's Securities Arbitration Policy Committee. I was a founder and past president of the Public Investors Arbitration Bar Association. I am currently the co-chair of the American Bar Association's Securities Arbitration Subcommittee.

I write in support of FINRA's proposed Rule Change eliminating the mandatory industry arbitrator from panels involving customer disputes.

Arbitrators and the arbitration process are supposed to be neutral. At a minimum, a panel with a member who is affiliated with the securities industry creates an appearance of prejudice or bias. Given the extensive movement of financial advisers from one firm to the next, it is virtually impossible to know whether a proposed industry arbitrator's friends or colleagues work at the firm a customer is suing.

This rule change will significantly improve the arbitration process and provide investors with the fundamental fairness that every investor should receive when they are required to submit their disputes to arbitration.

Accordingly, I urge the Commission to approve FINRA's proposed rule change.