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**VIA WEBSITE**

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

**Re: SR-FINRA-2010-053 Rule**

Dear Ms. Murphy:

I appreciate the opportunity to make comments on the proposed changes to FINRA's Code of Arbitration Procedure for Consumer Disputes. I am an attorney whose practice is dedicated entirely to investor disputes resolved through arbitration and in state and federal court. I am also a member and the President of the Public Investor Arbitration Bar Association (PIABA).

The proposed changes to the Panel Compilation Rule are beneficial to the public investor. Without question, the required industry arbitrator feeds the perception of bias. Removing the mandatory industry arbitrator will alleviate the likelihood that his or her fellow arbitrators will view this individual as an "expert." There is no need for required industry presence within FINRA dispute resolution forums.

Once again, I would like to express my gratitude for being able to submit these comments. The proposed modifications to the Panel Compilation Rule are positive for all parties in the forum and should be approved on an accelerated basis.

Respectfully,

Peter Mougey