

AIDIKOFF, UHL & BAKHTIARI

9454 WILSHIRE BOULEVARD

SUITE 303

BEVERLY HILLS, CALIFORNIA 90212

WWW.SECURITIESARBITRATION.COM

PHONE (310) 274-0666

FAX (310) 859-0513

PHILIP M. AIDIKOFF
ROBERT A. UHL[§]
RYAN K. BAKHTIARI*†◇
KATRINA M. BOICE[°]

OF COUNSEL
DAVID HARRISON*
DAVID G. SPIVAK

*ALSO ADMITTED NEW YORK
†ALSO ADMITTED DISTRICT OF COLUMBIA
◇ALSO ADMITTED TEXAS
°ADMITTED IDAHO ONLY
§RETIRED FROM FIRM

July 1, 2014

Office of the Secretary
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549-1090

Re: **SR-FINRA-2014-028**
**Notice of filing of a Proposed Rule Change to Revisions to the Definitions of
Non-Public Arbitrator and Public Arbitrator**

To The Office of the Secretary:

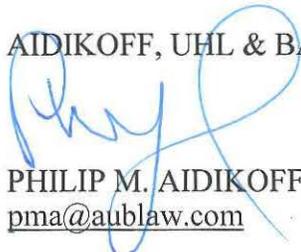
I am a partner at Aidikoff, Uhl & Bakhtiari, a law firm devoted to the representation of individuals and institutions in disputes with Wall Street and the Financial Services Industry. I am a former president of the Public Investors Arbitration Bar Association (PIABA) and a past chair of FINRA's National Arbitration and Mediation Committee (NAMC). I also served as a member of the Securities Industries Conference on Arbitration (SICA) as well as the SIPC Modernization Task Force.

The purpose of this letter is to support the above referenced rule proposal. The notion that an arbitrator who could have spent nineteen and a half years employed in the securities industry can somehow become a "public" arbitrator after a relatively brief cooling off period is contrary to common sense and provides a serious optics problem for arbitrator selection. The integrity of the process requires that customers who are mandated into the FINRA arbitration system as the only dispute resolution forum understand that the triers of facts will be composed of individuals who are not saddled with the baggage that results from prior employment as a securities professional. In the past FINRA has attempted to walk a fine line between the efforts of the securities industry to oppose a truly public panel and FINRA's obligation to investor protection. The bright line test envisioned by this proposed rule eliminates the conflicts naturally associated with the existing definition. Public should mean public.

I urge the Commission to approve this Rule on an expedited basis.

Very truly yours,

AIDIKOFF, UHL & BAKHTIARI


PHILIP M. AIDIKOFF
pma@aublaw.com

PMA/hh