

Law Offices of

6

**HERBERT E. POUNDS, JR., P.C.**

**Herbert E. Pounds, Jr.**  
Attorney-Mediator  
[www.investorjustice.com](http://www.investorjustice.com)

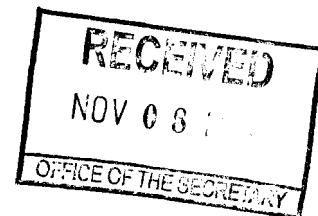
17890 Blanco Road, Suite 201  
San Antonio, Texas 78232-1009

Telephone: (210) 492-7627  
Facsimile: (210) 492-2915  
Email: [hpounds@satx.rr.com](mailto:hpounds@satx.rr.com)

*SR-NASD-2003-101*

November 1, 2004

Jonathon G. Katz  
Secretary  
Securities and Exchange Commission  
450 Fifth Street, N.W.  
Washington, D.C. 20549-0609



Re: Proposed Amendment to Rule 10304 of the NASD Code of Arbitration Procedure

Dear Mr. Katz:

I represent investors in claims against registered representatives and broker-dealers. It is my understanding that on June 19, 2003, NASD Dispute Resolution filed SR-NASD-2003-101 with the SEC to amend Rule 10304 of the NASD Code of Arbitration Procedure. The proposed rule amendment was then published in the Federal Register. The comment period ended on September 4, 2003. An amendment was filed on February 3, 2004.

While I do not agree with every facet of this rule change to the six year eligibility rule, the proposed rule will insure that Claimants do not end up with no forum in which to bring a claim. Therefore, I would urge that this rule be approved as soon as possible.

Very truly yours,

A handwritten signature in cursive script that reads "Herbert E. Pounds, Jr.".

Herbert E. Pounds, Jr.