

July 19, 2006

Jonathan G. Katz, Secretary
Securities and Exchange Commission
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rule-comments@SEC.gov

Mr. Katz,

As an attorney in private practice I support Mr. Feinberg's comments on the

proposed rule change. I have practiced in this area for 20 years as counsel for arbitration parties (usually investors) as an arbitrator and as a mediator. I have seen increased abuse in the use of attorney issued subpoenas in the arbitration forum. Overbroad requests are directed to third parties across state lines with threatening phrases like "under penalty of law" and "be forewarned that ... Failure to comply is subject to contempt order" then signed only by an attorney... from another state. The process needs more oversight, not less.

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