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WRITER'S DIRECT INFORMATION:

April 9, 2008

Ms. Nancy Morris
Secretary
Securities Exchange & Commission
100 F Street, NE
Washington, DC 20549

**Re: File No. SR-FINRA-2007-021
Proposal Amending Rules 12206 and 12504 of the Customer Code and
Rules 13206 and 13504 of the Industry Code to Address Motions to Dismiss**

Dear Ms. Morris:

Bressler, Amery & Ross, P.C. ("BA&R") appreciates the opportunity to comment on the above-referenced rule proposal (the "Proposal") submitted to the Commission by the Financial Industry Regulatory Authority ("FINRA"). BA&R has been representing clients in the securities industry for over 25 years with a significant part of that practice participating in self-regulatory organization arbitrations.

FINRA's effort to provide guidance to participants in the arbitration process is welcomed and appreciated. FINRA's arbitration rules, however, should not be narrowly written so as to penalize parties for pursuing the dismissal of a meritless matter prior to a plenary hearing. Further, FINRA's rules should be consistent with well established legal principals and public

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Conclusion

BA&R respectfully urges against adoption of proposed Rules 12504(a)(6), (7), (9) and (10) and 12206(b)(5), (8) and (9) which, as drafted, unjustifiably limit the substantive grounds for prehearing dispositive motions. FINRA's concerns regarding abuse of motion practices can be dealt with in a less restrictive manner and through existing rules and the other proposed rule amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Amery", with a long horizontal flourish extending to the right.

Brian F. Amery

BFA:EAZ:mam