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October 31, 2014

VIA ELECTRONIC SUBMISSION

Ms. Marcia E. Asquith
Office of the Corporate Secretary
FINRA
1735 K Street, NW
Washington, D.C. 20006-1506

Re: Regulatory Notice 14-35
Comments on Proposed Adoption of FINRA Rule 2231

Dear Ms. Asquith:

Thank you for the opportunity to comment on Notice 14-35. We are submitting these comments on behalf of Georgia State University College of Law's Investor Advocacy Clinic. Our clinic represents investors who have suffered losses resulting from broker misconduct but cannot afford or find legal representation due to the size of their claim. We serve as the voice of small investors and because this proposal could affect small investors in arbitration, we submit this comment letter in support of this rule with some variations.

We support the goal captured by FINRA's proposal, which would provide greater protections for investors, however, we believe some of these protections could be expanded. First, the proposed changes that would allow a third party to receive statements can provide greater protection for the investor so long as the investor continues receiving his own statement every quarter. Second, the electronic statements will provide greater flexibility and greater access to statements, however, this should be permitted only if the investor affirmatively elects the option. Finally, although brokers should not be permitted to relinquish their responsibility to review and monitor their clients' account, the SIPA disclosure could go further to make the information even more prominent.

The option for a third party to receive quarterly statements can provide greater protection for investors. Some investors, especially the elderly, would greatly benefit from this change because it creates the option of having additional eyes monitor accounts for discrepancies. We agree that the statements should continue to be sent to the investors in addition to the third party. If the investor were not to receive their own statements, it could increase the risk of fraud

because the investor would not be able to monitor their own account, which would make it harder for the investor to report potential problems or ask questions.

We also support the possibility of electronic statements if the investor must affirmatively elect the option. By allowing electronic statements, this rule will give investors more control and choice over how their statements are received. Many investors monitor their banking and other financial accounts online. For investors who prefer this method, it would provide easier access to account information as well as decrease the opportunity for lost or stolen mail. However, because many investors, including some senior investors, do not use technology to monitor their finances, a default rule for electronic statements in all cases unless an investor opts out would not benefit all investors. Investors who are not technologically savvy might not know how to electronically opt-out of an electronic statement policy, creating confusion as well as the possibility of an investor not being able to access his statements.

The requirement to provide SIPA disclosure on the first page of the quarterly statement also helps protect investors. By requiring a firm to clearly and prominently disclose on the front of the statement the contact information for customer concerns, smaller investors are more likely to get the help or clarification they need in order to better understand their statements and monitor their accounts. It also serves as a reminder that investors should regularly review their statements and ask questions. This rule could provide even more protection, however, by requiring the contact information for the clearing firm to be on the front of the statement with the disclosure, and not on the back of the statement. If the goal is to highlight the information, putting it on the back of the statement, even if bold or highlighted, could result in the investor missing it. Ideally, the SIPA disclosure would be placed on the envelope to alert investors to the importance of reviewing their statement, as well as alert them to carefully review the contents of the statement. We also want to ensure that these SIPA disclosures do not incentivize brokers to shirk their responsibilities to alert investors of potential problems or shift the burden solely to investors.

Conclusion

We support FINRA's efforts to protect investors through the adoption of Regulatory Notice 14-35. By providing more options for investors to receive their quarterly statements, the proposal provides more safeguards for investors and greater flexibility to monitor their accounts.

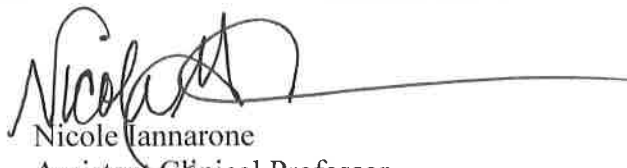
Best regards,



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