

From: James Barney [mailto:jbarney@sulloy.com]

Sent: Monday, November 10, 2008 8:43 PM

To: Comments

Subject: FDIC Interim Rule RIN # 3064-AD37 -- adverse impact on Interest on Lawyers' Trust Accounts (IOLTA) funding for legal services to the poor

To the FDIC:

I am a member of the Board of Directors of New Hampshire Legal Assistance (NHLA). About 25 percent of our funding comes from our state IOLTA program. Please amend the above interim rule to extend full coverage without any dollar limit to all IOLTA accounts. If these accounts are not given full coverage, many lawyers will feel compelled to convert their trust and escrow IOLTA accounts to straight non-interest-bearing transactional accounts, and this will result in a severe loss of funding for our program and a corresponding drastic cut in legal services to the poor, whose need for such services is greater in this economic downturn.

Sincerely,

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