

November 11, 2008

Ms. Sheila C. Bair
Chair, Federal Deposit Insurance Corporation
550 17th Street, NW, Room 6028
Washington, D. C. 20429

Dear Chairman Bair:

I am a client board member of Legal Aid of NorthWest Texas. I have been involved with this organization for many years. I am an advocate of the impoverished in my community and I would like to express my concerns about the potential unintended consequences to the Interest on Lawyers Trust Accounts (IOLTA) program along with your announced Temporary Liquidity Guarantee Program (TLGP).

Please make sure that your interim rules to not hinder the critical resources that are provided by the IOLTA program to the impoverished community.

The funds that are provided by IOLTA make it possible for Legal Aid programs to render basic civil services to the poor and vulnerable in Texas including the elderly, persons with disabilities and victims of domestic abuse, to name a few. Without these IOLTA funds, the impoverished community would be excluded from participating in our justice system, and would hence be deprived of any ability to obtain justice.

The need for legal advice and representation in Texas has never been as great it currently is due to the devastation of Hurricane Ike as well as the severe economic downturn. If not for access to legal advice and assistance, many of these families would add to the growing rate of the homeless.

I ask that the FDIC consider IOLTA accounts to be non-interest bearing accounts under the terms of the TLGP which is supported by the structure of IOLTA. No one, no attorney or client, expect to receive interest on the short-term escrow accounts that are accrued to support the mission of legal assistance to the poor. In case the FDIC cannot consider IOLTA accounts to be non-interest bearing, we would ask that an exception be made in the TLGP interim rules providing unlimited deposit insurance to IOLTA accounts.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in cursive script that reads "Wilma J. Black". The signature is written in black ink and is positioned above the printed name.

Wilma J. Black
Legal Aid of NorthWest Texas
Board of Directors