

November 13, 2008

Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Comments To RIN #3064-AD37
(Interim Rule Implementing The Temporary Liquidity Guarantee Program (TLGP))

Dear Mr. Feldman:

We serve as the volunteer President and President-Elect of the Board of Directors of the Neighborhood Legal Services Association of Western Pennsylvania ("NLSA"). We write to add our voices in support of The American Bar Association (ABA), the National Legal Aid and Defenders Association, and the Interest On Lawyers' Trust Accounts ("IOLTA") community's request for the FDIC to provide unlimited deposit coverage for funds held in IOLTA accounts, by either interpreting IOLTA accounts as non-interest bearing, or in the alternative, as an exception to the TLGP rule.

As you are no doubt aware under the current interim rule, attorneys who handle large amounts of funds for a short period of time may wish to deposit such funds in non-interest bearing, non-IOLTA accounts, so the funds are covered by the FDIC guarantee and are thus more secure. Attorneys handling a million-dollar transaction or settlement where the funds remain in the attorney's trust account for only a short time period normally would process the funds through his/her IOLTA account. With the *current* TLGP rule, attorneys might process such funds through non-interest bearing, non-IOLTA trust accounts out of an abundance of caution, rather than in IOLTA non-interest bearing trust accounts.

Founded in 1966, Neighborhood Legal Services Association (NLSA) offers free civil legal services for individuals and families who would otherwise be denied access to justice -- one of the very basic rights that so many of us take for granted. NLSA exists to protect the poor and vulnerable individuals in our community through effective civil legal representation and provides assistance to those clients seeking a fair resolution to significant problems including protection from abuse, child custody, and child support; fighting unfair evictions and stopping mortgage foreclosures; removing legal barriers to employment; and accessing public benefits. NLSA's clients include hard-working low-wage earners, victims of domestic violence, the disabled, abused seniors, and the homeless, as well as countless others -- people without the resources to afford legal assistance even when their need is desperate. Assistance may include direct legal representation, legal advice and counsel, referrals, community legal education, self-help clinics, or special projects.

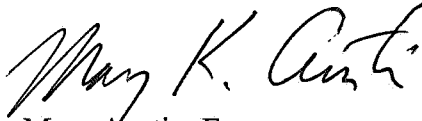
NLSA services would be drastically affected and reduced without the grant moneys provided through Pennsylvania attorneys' IOLTA accounts. Especially in the wake of declining program revenue resulting from lower interest rates nationwide, and the increasing demand for NLSA

services in this economic recession, protecting IOLTA accounts in order to encourage attorneys' reliance on them is essential.

The interim TLGP rule provides unlimited FDIC deposit coverage for funds held in non-interest bearing checking accounts. This unlimited deposit coverage came in response to corporations that have large amounts of funds for short periods of time in payroll checking accounts. We join with Senators Cardin and Specter in strongly urging you to provide an exception in the Final Rule specifying that IOLTA accounts are guaranteed unlimited deposited insurance through TLGP.

Thank you for your attention to this matter.

Very truly yours,



Mary Austin, Esq.
President, NLSA
Associate Counsel, UPMC*

Efrem M. Grail, Esq.
President-Elect, NLSA
Partner, Reed Smith LLP (Pittsburgh and Philadelphia)*

*For identification purposes only

cc: Arlen Specter, United States Senator
Benjamin L. Cardin, United States Senator
Robert R. Racunas, Executive Director, NLSA