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November 13, 2008

Via Email to Comments@FDIC.gov
Ms. Sheila C. Bair
Chair, Federal Deposit Insurance Corporation
550 17th Street, NW
Room 6028
Washington, DC 20429

RE: RIN # 3064-AD37

Dear Chairman Bair:

It has come to my attention that your announced Temporary Liquidity Guarantee Program (TLGP) could adversely affect the resources generated by the Interest on Lawyers Trust Accounts (IOLTA) program. As you may know, IOLTA funds provide a critical source of revenue for basic civil legal services to the poor in Texas.

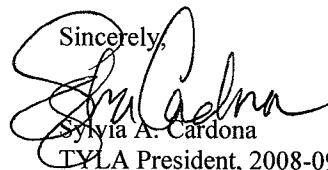
While lawyers in Texas promote participation in pro bono cases, the truth is not all citizens needing representation can be reached through these efforts alone. IOLTA funds greatly increase the chances of obtaining legal assistance by those most vulnerable in our communities, including the elderly, persons with disabilities and victims of domestic abuse. I grew up in the Texas Rio Grande Valley, an area which has benefited from legal services made available through legal aid. It was my upbringing, along with my desire to help individuals who can't secure legal assistance on their own, that motivated me to attend law school and become a lawyer.

I am honored to serve at the President of the Texas Young Lawyers Association (TYLA), the public service arm of the State Bar of Texas. While several TYLA projects assist low income Texans, the mission to provide access to justice could not be furthered without funds and resources generated by the IOLTA program.

I urge you to make an accommodation as you implement your interim rules to ensure that the critical resources generated by the IOLTA program to provide legal representation to the impoverished are not adversely affected. Specifically, I urge the FDIC to consider IOLTA accounts as non-interest bearing accounts under the terms of the TLGP. I further urge the FDIC to grant an exception in the TLGP rules explicitly stating that funds in IOLTA accounts have unlimited deposit insurance coverage regardless of dollar amounts.

Thank you for your consideration of this request.

Sincerely,



Sylvia A. Cardona
TYLA President, 2008-09