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Ladies and Gentlemen:

As an attorney practicing law in the state of Florida, I urge the FDIC to include IOLTA accounts within the unlimited insurance coverage of the Temporary Liquidity Guarantee Program (TLGP). Failure to do so will perpetuate a dilemma for attorneys regarding the stability of client funds and will result in the loss of millions of dollars in IOLTA funds that are used for the provision of civil legal services to the poor, the administration of justice and law related education.

The current economic instability has created a dilemma for attorneys. Notwithstanding that attorneys in my home state of Florida are required to deposit short-term funds in IOLTA accounts, under the current TLGP Interim Rules, lawyers holding client funds for a short time exceeding \$250,000 must consider whether to continue to use their IOLTA accounts or to place their client funds in a fully insured, non-interest bearing deposit transaction account. Establishing multiple accounts at various financial institutions for amounts over \$250,000 is not a viable solution; the lawyer may not even know whether a client's cumulative funds deposited in a single institution exceed the \$250,000 ceiling for insured funds, and it is not practical to separate a large deposit that is simply in the IOLTA account just long enough for the check to clear.

Including IOLTA accounts within the unlimited insurance coverage of TLGP would serve two purposes simultaneously -- it would resolve the stability dilemma facing attorneys and preserve IOLTA funds that are used for the provision of civil legal services to the poor, the administration of justice and law related education -- all of which are vital to our democratic system's guarantee of equal access to justice for all.

Please include IOLTA accounts within the unlimited insurance coverage of TLGP.
Thank you for your consideration of this important issue.

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