



STATE BAR OF WISCONSIN

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October 11, 2010

Robert E. Feldman, Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
Reference: RIN 3064-AD37

Dear Mr. Feldman:

On behalf of the State Bar of Wisconsin, I respectfully request the FDIC delay implementation of the proposed amendment to the FDIC Temporary Liquidity Guarantee Program (RIN 3064-AD37) until final congressional can be taken on related legislation.

The proposed revisions would impact the Interest on Lawyers Trust Account (IOLTA) Program. IOLTA accounts, although included within the current definition of non-interest bearing accounts receiving unlimited coverage under the existing Transaction Account Guarantee (TAG) program, would be excluded in the revised Regulation, and thus cease to be fully covered effective January 1, 2011.

IOLTA program funding is a critical component of Wisconsin's strategy to provide legal services to low- and moderate income residents. In fact, since its inception in 1988, the IOLTA program has generated over \$29.5 million for these essential services.

As you probably know, bi-partisan legislation is pending that would correct the unintended exclusion of IOLTA accounts included in the Dodd Frank Wall Street Reform and Consumer Protection Act.

Delaying implementation would minimize unnecessary confusion for attorneys and participating financial institutions in the near-term and avoid potentially significant damage to the IOLTA program in the long-term.

Sincerely,

James C. Boll, Jr.
President