



Junior Achievement of  
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Sheila C. Bair  
Chair, Board of Directors  
c/o Robert E. Feldman, Executive Secretary  
Federal Deposit Insurance Corporation  
550 17th Street, N.W.  
Washington, D.C. 20429

Re: FDIC request for Public Comment on Wide-Ranging Issues Involving  
Industrial Loan Company Charters as provided in August 17, 2006, press release  
and Federal Register 6714-01-P.

Dear Chairwoman Bair,

Junior Achievement (JA) is a national not-for-profit organization that educates and inspires young people to value free enterprise, business, and economics to improve the quality of their lives. Since its founding in 1919, JA has contributed to the business and fiscal education of young people in the United States and throughout the world. JA's mission is to ensure that every child in America has a fundamental understanding of the free enterprise system. Currently, Junior Achievement reaches approximately 7 million students worldwide. Through age-appropriate curricula, JA programs begin teaching children at the elementary school level how they can impact the world around them as individuals, workers, and consumers. JA programs continue through the middle and high school grades, preparing students for future economic and workforce issues they'll face.

It is our understanding the FDIC is inquiring whether "statutory, regulatory, or policy changes should be made in the FDIC's oversight of ILCs in order to protect... important Congressional objectives." As you are aware, the United States Congress has maintained a specific and consistent policy that lending and financial institutions should be supportive of the community wherein they conduct operations. This is clearly articulated in the requirements of the Community Reinvestment Act.

Over the years, Junior Achievement has maintained a strong and productive relationship with Industrial Banks. The officers and employees of Industrial Banks have played a vital role in helping our organization improve the quality of America's children's education by supporting JA's in-school programs and fund-raising efforts. Industrial Banks participates in and enthusiastically encourages our efforts, goals, and concerns with support that well exceeds the requirements mandated in the Community Reinvestment Act statutes. Our colleagues in other charitable and community-based activities who have dealt with Industrial Banks share this judgment.

Let Their Success  
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We understand that the FDIC is faced with various opinions regarding Industrial Banks. Our field presidents have had extensive experience with Industrial Banks and can report that their active community support goes beyond any congressional objectives, and/or requirements of the FDIC. We have had thousands of industrial loan bank employees teach the JA curriculum in our schools. They are passionate people inspiring our kids to learn the economics of life. These caring adults share their experiences with the students showing them what it takes to be successful and their effort is having a profound impact.

Thank you for the opportunity to participate in your information-gathering activity.

Sincerely,

Philip T. Cofield  
President & CEO  
Junior Achievement of Utah, Inc.

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