

Jones & Smith

Attorneys at Law

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June 25, 2009

Camilla Faulk
Clerk of the Supreme Court
PO Box 40929
Olympia, WA 98504-0929

Re: Suggested Amendments to RPC 1.15A, ELC 15.4, ELC 15.7, and ELPOC 15.4

Dear Ms. Faulk:

The law firm of Jones & Smith strongly supports the proposed amendments to RPC 1.15 and related rules concerning IOLTA interest rates. We are attorneys in private practice and have maintained IOLTA accounts since the inception of the rule. We strongly believe that it is only fair that financial institutions provide interest rates for IOLTA accounts that are comparable to similarly situated accounts.

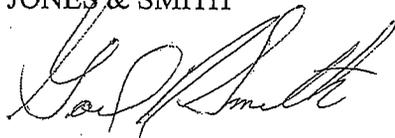
We strongly support the provision of civil legal aid to low-income individuals. The Volunteer Lawyer Programs funded by the Legal Foundation provide the vital infrastructure which makes the goal achievable. Without these programs a vast segment of our society would be effectively denied access to the Court.

In light of the current economic climate and related legal aid funding crisis, we recognize how critical increased revenue generated from a comparability rule is for our civil legal services programs. It is our understanding that several states have implemented a similar comparability rule and have not encountered significant problems doing so. Likewise, we do not anticipate any problems with our local banks.

Thank you for your consideration of our comments. Please do not hesitate to contact us should you wish to discuss these amendments further.

Sincerely,

JONES & SMITH



GAIL R. SMITH
GRS/sh



GARY T. JONES

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