

Legal Aid Society of Northeastern New York, Inc.

**Fighting For Fairness
Promoting Justice!**

*Serving Northeastern New York with offices in
Albany, Amsterdam, Canton, Plattsburgh and Saratoga Springs.*

Peter V. Coffey
President
Lillian M. Moy
Executive Director
Peter D. Racette
Deputy Director
Wendy Wahlberg
Deputy Director

June 20, 2005

Victor Fortuno
Legal Services Corporation
3333 K Street, NW
Washington, DC 20007

Re: Regulatory Agenda

Dear Victor:

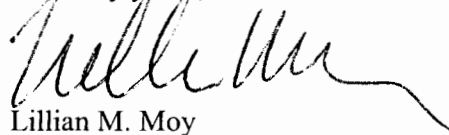
Thank you for the opportunity to offer my suggestions on the regulations that the Legal Services Corporation might wish to consider. First, I do not believe that there must be a regulatory agenda of any type. There are no new statutory requirements to implement and most programs have learned to live with the current regulations. While there are issues to be addressed with the field and other stakeholders, regulations may not be the most productive or swift way to proceed.

I strongly agree with NLADA's position that in lieu of a regulatory agenda, it might be more productive to work with field programs on matters of mutual concern and interest such as insuring the diversity of legal services programs so that we can better serve our increasingly diverse client community. As Linda Perle notes in the NLADA response, it might well be more productive for NLADA and LSC to address these issues outside of the regulatory context. If the Corporation does choose to look at 1607 and, 1616, I would be very interested in helping to shape the regulatory response so that these regulations could strongly support enhancing board diversity, as well as compliance with non-discrimination laws such as the ADA.

Should the Board be fully committed to a regulatory agenda, I join the NLADA in suggesting that 1610, 1621, 1624 and 1631 are ripe for some measure of regulatory review.

Thank you for the opportunity to comment on your proposed regulatory agenda. I hope all goes well..

Sincerely yours,



Lillian M. Moy
Executive Director

LMM:mm
cc: Linda Perle