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September 3, 2007

Michelle T. Smey Administrative Officer, State Board of Funeral Directors P.O. 2649 Harrisburg, Pa. 17105-2649

Reference No. 16A-4812 (Pre-need Funeral Arrangements)

Dear Mr. Smey:

As a member of the Board of the Funeral Consumers Alliance of Greater Philadelphia, I want to state my support of Proposed 13.228 which would govern customer transfers of pre-need funds to another funeral director or funeral entity.

I would like to see the language modified to include all currently existing pre-need/pre-paid funeral arrangements. In that way all current, Pennsylvania residents who have purchased pre-need funerals will be free to move their contracts to another funeral director if necessary.

I would also like to see a Pennsylvania resident be able to obtain a full refund of the pre-need contract, in the event they would have to liquify the account for whatever reason.

Contract provisions which are added in 13.227, seem contrary to the purpose of a pre-paid/pre-need contract. Additional charges should not be allowed at the time of need, regardless of what the funeral homes's current rates have become since the contract.

Thank you for your consideration.

Sincèrely.

InsX Cutler Member - Board of Directors, Funeral Consumers Alliance of Philadelphia