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INDEPENDENT REGULATORY
REVIEW COMMISSION

November 4, 2009

Mr. Arthur Coccodrilli
Chairman, IRRC
333 Market Street, 14th Floor
Harrisburg, PA 17101

Dear Mr. Coccodrilli:

This letter is to encourage you to support Regulation 16A-4816. It is vital in this day and age, when our rising senior population is increasingly vulnerable to fraud, that unlicensed individuals should not be permitted to engage in the pre-need sale of funerals.

Regulation 16A-4816 is in keeping with Walker v. Flynn, the federal case of 2005 which did not overrule Pennsylvania statute in case law which provides that only licensed funeral directors can sell pre-need services and merchandise incidental thereto.

Consumers overwhelmingly believe that only licensed professionals should be able to sell at-need and pre-need funerals. The AARP of Pennsylvania supports regulation 4816 that only licensed funeral directors can pre-arrange and pre-finance a funeral.

Respectfully yours,

Frank D. DeBor
Attorney at Law and
President, Frank F. DeBor Funeral Home

FDD/tmc