

Elder Law Associates

OF PENNSYLVANIA, A PRIVATE LAW FIRM

elderlawpa.com

2639

November 5, 2009

INDEPENDENT REGULATORY
REVIEW COMMISSION

2009 NOV -9 AM 10:10

RECEIVED

Independent Regulatory Review Commission
333 Market St., 14th Floor
Harrisburg, PA 17101

Re: Meeting to Review 1416

Dear Sirs:

I request an opportunity to speak before the Independent Regulatory Review Commission on November 19, 2009, at the 10:30 a.m. meeting.

From 1973 until 1979 and from 1981 until 1992, I was the general counsel for Funeral Consumers Alliance. Funeral Consumers Alliance is made up of approximately 150 affiliates in nearly all of the states, four of which are in Pennsylvania. We have approximately 400,000 members nationwide. I currently serve on the National Board. In addition, I was the first Chief Counsel of the Pennsylvania State Ethics Commission, 1979-1980, where I drew the rules and regulations for the Commonwealth in ethics matters.

I specifically want to address the Rule 1416 as to its compliance with Walker, et al. v. Flitton, et al., 364 F. Sup. 2d 500, M.D. PA (2005), efficacy, and the impact on seniors who are the primary consumers of prepaid funeral service plans.

I will be following up with a letter to you with attachments so that you will have familiarity with my concerns, and be able to ask questions to most prudently use the time.

Thank you very much for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "David R. Morrison". The signature is fluid and cursive, with a large initial "D" and "M".

David R. Morrison, Esquire

DRM/cmm

cc: Laurie Powsner, President, FCA
Joshua Slocum, Ex. Director, FCA
Arlene Stromberg, President, FCA of Western PA
Laurie Mulvey, President, Last Rights of Central PA
Robert Gasparro, Esquire, President, FCA of Greater Phila.
Richard Gross, President, FCA of South Central PA
General Counsel, PA State Funeral Board

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