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# Cumplings

FUNERAL HOME INC.

Fax: 814-837-8886

151 Greeves St., Kane, PA 16735  
Phone: 814-837-8370 - Sam Cummings, Supervisor

10 E. Main St., Mt. Jewett, PA 16740  
Phone: 814-778-5571 - Sam Cummings, Jr., Supervisor

Arthur Coccodrilli  
Chairman IRRC  
333 Market St., 14<sup>th</sup> Floor  
Harrisburg, PA 17101

Re: Regulation 16A-4816

Dear Chairman Coccodrilli,

I am writing you to urge your support for regulation 16A-4816. This is a regulation proposed by the State Board of Funeral Directors specifically to address the concerns raised in the federal court case, Walker v. Flitton, 2005.

The federal court case of Walker did not overrule Pennsylvania statute or case law which provides that only a licensed funeral director can sell or offer to sell pre-need services.

The State Board of Funeral Directors held public meetings seeking input from all interested parties prior to promulgating this regulation. I was able to sit in on one of these meetings and offer comment.

There have also been two independent consumer studies that overwhelmingly supported the concept that only licensed funeral directors should be able to arrange pre-need and at-need services.

AARP, the largest senior group in PA supports regulation 4816.

Everything I mentioned above is fact. I would like to also offer my personal input. Over the years I have seen various groups try to manipulate this area of the law and, without exception; the underlying cause has always been to allow these groups to hire less qualified people for less money so that they themselves can make more. Make no mistake; their motivation is not to better serve the consumer.

I strongly urge your support for this regulation.

Sincerely,

Sam Cummings Jr.  
Past President  
Pennsylvania Funeral Directors Association

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