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INDEPENDENT REGULATORY
REVIEW COMMISSION

Capital City Funeral Directors Association
Established April 1923

November 9, 2009

Mr. Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street
Harrisburg, Pa 17101

Dear Chairman Coccodrilli:

As Secretary of the Capital City Funeral Directors Association and its 24 member funeral homes, I am writing to advise you that the Capital City Funeral Directors Association fully supports Regulation 16A-4816 and we are adamantly opposed to unlicensed funeral home employees being permitted to arrange preneed funeral arrangements.

The State Board of Funeral Directors has held numerous public hearings during the past four years in order to address the issues raised in the federal court case Walker v. Flitton (2005), prior to promulgation of Regulation 16A-4816.

The State Board has carefully written this regulation to address the issues in the Walker v. Flitton (2005) case, while staying in compliance with the Funeral Director Law, which *prohibits* the offer to sell or selling of preneed arrangements by unlicensed individuals.

Furthermore, this regulation addresses the need in the profession to protect consumers, while at the same time preserving the integrity of the funeral director's license.

Regulation 16A-4816 provides a solid safeguard to the public concerning their preneed arrangements. It is in the public's best interest.

We respectfully request IRCC's approval of Regulation 16A-4816 in its current form.

Sincerely,

Lynn A. Ronan, F.D., Secretary