

James J. Sweeney Funeral Home, Inc.

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James J. Sweeney, Supervisor

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INDEPENDENT REGULATORY
REVIEW COMMISSION

November 9, 2009

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

Dear Mr. Croccodrilli,

On behalf of myself, and The Delaware County Funeral Directors Association, With our 24 members, I am writing to let you know that we fully support Regulation 16A-4816.

Regulation 16A-4816 was proposed by the State Board of Funeral Directors, specifically to address the concerns raised in the federal court case, Walker v. Fulton 2005. At the courts suggestion, this regulation helps define what activities by unlicensed employees are permissible.

The federal court case 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 and merchandise incidental thereto.

The State Board of Funeral Directors, over a period of years, held public meetings seeking input from all interested parties prior to promulgating this regulation.

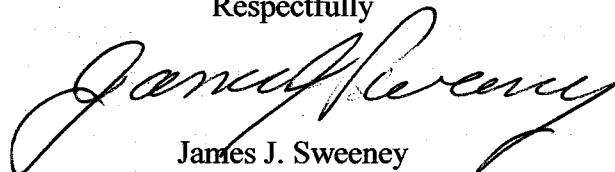
Pennsylvania law has already been tested on the issue of unlicensed activity, and it was upheld in the appellate courts that only a licensed funeral director call sell or offer to sell pre-need funeral services or merchandise incidental there to as well as cremation services.

Consumers in 2 independent studies overwhelmingly supported the concept that only licensed funeral directors should be able to arrange pre-need and at need funeral services. 2005 77.2 % and in 2009 87.2 %.

AARP, the largest senior group in Pennsylvania supports regulation 16-A 4816, that only licensed funeral directors can prearrange and prefinance funeral.

Thank you for your support in the very important matter.

Respectfully



James J. Sweeney