

2639



RECEIVED

2009 NOV 16 PM 1:30

INDEPENDENT REGULATORY  
REVIEW COMMISSION

November 16, 2009

By Facsimile (717-783-2664)

and Via Email:

IRRC@IRRC.STATE.PA.US

JJEWETT@IRRC.STATE.PA.US

FWILMARTH@IRRC.STATE.PA.US

Re: Proposed Regulation 16A-4816

Dear Chairman, Commissioners, Director Wilmarth and Mr. Jewett:

Please allow this correspondence to serve as opposition to State Board of Funeral Directors Regulation #16A-4816 (IRRC #2639).

As the beneficial owner of eight funeral home locations serving the citizens of Pennsylvania, Keystone is opposed to any and all proposed regulations which harm consumers. Simply put, Regulation 16A-4816 is not in the best interests of consumers.

There is no legitimate reason why pre-need sales persons should not be able to assist consumers in selecting funeral services, negotiating the sale of funeral services, contracting for such services, and making financial arrangements for such services. Limiting such actions to licensed funeral directors only protects funeral directors, without benefiting consumers.

We respectfully urge disapproval of the proposed Regulation.

Very truly yours,

A handwritten signature in black ink, appearing to read "James D. Price", is written over a large, stylized circular flourish.

James D. Price  
Chief Operating Officer