

2639

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From: Jewett, John H.
Sent: Saturday, November 14, 2009 3:43 PM
To: Geinett, Wanda B.; Wilmarth, Fiona E.; Johnson, Leslie A. Lewis
Subject: FW: Pennsylvania Administrative Code Title 49, Part I, Subpart A, Chapter 13 - No. 16A-4816 (Preneed activities of unlicensed employees - #2639)
Attachments: 20091113162207.pdf

2009 NOV 16 AM 7:22

INDEPENDENT REGULATORY
REVIEW COMMISSION

Final comments on #2639.

From: Mark Neidinger [mailto:McNeidinger@nglic.com]
Sent: Friday, November 13, 2009 5:23 PM
To: IRRC; Jewett, John H.
Cc: Mat Dew; Mark Neidinger
Subject: Pennsylvania Administrative Code Title 49, Part I, Subpart A, Chapter 13 - No. 16A-4816 (Preneed activities of unlicensed employees - #2639)

Mr. Jewett,

Attached are comments from National Guardian Life Insurance Company relative to the above referenced regulation. Please file with the IRRC.

Sincerely,

Mark C. Neidinger
Associate General Counsel

mcneidinger@nglic.com
Direct Phone No. 608.443.5253
Direct Fax No. 608.443.5153

National Guardian Life Insurance Company
Two East Gilman Street
Madison, WI 53703-1494
Main Phone No. 608.257.5611

web: <http://www.nglic.com>

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November 13, 2009

John H. Jewett
Regulatory Analyst
Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

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Via Email to: irrc@irrc.state.pa.us Independent
and jjewett@irrc.state.pa.us REVIEW COMMISSION

Re: Pennsylvania Administrative Code Title 49, Part I, Subpart A, Chapter 13 - No. 16A-4816 (Preneed activities of unlicensed employees - #2639)

Mr. Jewett:

Founded in 1909, National Guardian Life Insurance Company is a mutual insurance company located in Madison, Wisconsin and is licensed to do business in Pennsylvania and 48 states and the District of Columbia. NGL markets preneed and final expense life insurance as well as group dental and vision coverage through independent agents. It is also active in mergers and acquisitions to supplement its growth. National Guardian Life is rated "A-g (Excellent)" by A.M. Best.

National Guardian Life Insurance Company appreciates the opportunity to comment on the above referenced proposed rules regarding the activities of unlicensed persons proposed by the Pennsylvania State Board of Funeral Directors.

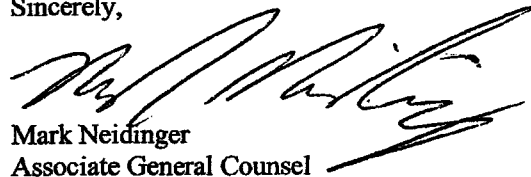
NGL is opposed to this regulation for the reasons set forth in the submissions of both Forethought Financial Group and Assurant Solutions. NGL concurs in their comments.

NGL believes that the Pennsylvania State Board of Funeral Directors has not demonstrated a need for the regulation. To illustrate this fact, in their submission to the IRRC, the Pennsylvania State Board of Funeral Directors indicates that the regulation is not based upon any scientific data, studies or references.

This regulation will adversely affect many groups of individuals and companies in Pennsylvania despite the Board's conclusion to the contrary. These groups include insurance agents, funeral directors, insurance companies and the general public. Finally, NGL believes that the scope of this regulation exceeds the State Board of Funeral Directors' authority as it would inroads in the regulation of insurance.

NGL appreciates your consideration of these comments. If you have any questions or concerns regarding these comments, please do not hesitate to contact me at mcneidinger@nglic.com or at 608.443.5253.

Sincerely,



Mark Neidinger
Associate General Counsel