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November 15, 2009

The Honorable Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Via email: irrc@irrc.state.pa.us
CC: st-funeral@state.pa.us

RE: Comments on No. 16A-4816 (IRRC 2639)

Dear Chairman Coccodrilli and Commission Members:

My name is Frank Grabowski. I am a licensed funeral director, licensed life insurance agent, cemetery owner, and licensed real estate cemetery broker. I have been in the death care industry for over 25 years, and I believe I am qualified to comment on proposed regulation 16A-4816 (IRRC 2639) Preneed Activities of Unlicensed Employees.

After carefully reading the proposed regulation and the comments that have been posted on the IRRC website, I must express my opposition to the regulation as written. The prohibition against anyone except funeral directors from disseminating information to prospective customers clearly has no other purpose but to eliminate preneed options to the customer to the detriment to both the customer and the funeral home who seeks to increase his business by offering a lower cost alternative to the public. The argument used by the funeral board stating that a non-funeral director is acting as a funeral director when he shows a customer a worksheet is analogous to saying a clerk who shows a client an added column of figures on a financial statement is acting as a CPA. It just doesn't make sense. The licensed funeral director is ultimately responsible for his agents.

It is understandable that there are funeral directors, supporting this proposed regulation, that fear any perceived intrusion onto their turf. The PFDA has urged its members to support this regulation by telling its members that their licenses will be diminished if the regulation is not passed. This argument defies logic, and the numerous well-written comments that have already been sent preclude me from re-stating the benefits of offering the public pre-need funeral options. There is simply no public benefit to this proposed regulation.

Hoping that common sense prevails, I am

Respectfully yours,

Frank Grabowski
Managing Partner

Truly – A Perpetual Cared Cemetery With An Irrevocable Trust Fund

LOCATED ON ROUTE 61, NEAR SCHUYLKILL HAVEN
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