

**STANLEY E. SAYLOR**  
**REPUBLICAN POLICY CHAIRMAN**

**2639**



*House of Representatives*

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November 13, 2009

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

RECEIVED  
2009 NOV 16 AM 11:43  
INDEPENDENT REGULATORY  
REVIEW COMMISSION

RE: Comments in Opposition to Final-Form Regulation No. 16A-4816 (IRRC #2639)  
Preneed Activities of Unlicensed Employee, State Board of Funeral Directors

Dear Chairman Coccodrilli:

I am writing in opposition to Final-Form Regulation No. 16A-4816 (IRRC #2639) which would limit the ability of licensed funeral directors to serve consumers with advance planning choices and options by restricting their use and reliance upon an unlicensed employee or licensed insurance agent.

Such a regulation may decrease the amount of pre-planning in the Commonwealth, decrease competition and increase final expense costs for consumers. Meanwhile, I also question the need for such a regulation. According to the IRRC Regulatory Analysis Form posted on the IRRC website, in the 10 years from 1999 to 2008 of all the complaints received by the funeral board, they wrote that "only one case involved a situation where a licensed funeral entity utilized an unlicensed person to engage in preneed sales."

Thank you for considering my request to disapprove 16A-4816 (IRRC #2639).

Sincerely,

Handwritten signature of Stanley E. Saylor in black ink.  
STANLEY E. SAYLOR

SES/jah