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INDEPENDENT REGULATORY
REVIEW COMMISSION

State Board of Funeral Directors
c/o Board Administrator Michelle T. Smey
Department of State
2601 North Third Street
P.O. Box
Harrisburg, PA 17105-2649

Re: Suggested Draft Regulations Concerning the Activities of Employees
and Agents of Licensed Funeral Directors Involved in Preneed Arrangements

Dear Ms. Smey:

On behalf of the International Cemetery and Funeral Association ("ICFA"), we are pleased to endorse the above-referenced "Suggested Draft Regulations" that are in the process of being submitted to the Board by the Pennsylvania Cemetery & Funeral Association. We have been given the opportunity to review the draft regulations and we believe they represent a responsible, ethical method of disseminating important information to the public in order to facilitate the prearrangement of funerals. In particular, the fact that the draft regulations seek to hold the licensed funeral director responsible for the conduct of his or her employees and agents is an important safeguard in consumer protection. The draft regulations also provide that consumers will continue to have the opportunity to consult with licensed funeral directors if they wish. In sum, the draft regulations represent a responsible framework to expand the methods by which accurate and truthful information is conveyed to funeral consumers.

The ICFA was founded in 1887 and currently represents over 7,000 members primarily in the United States, but also in twenty-four foreign countries. The Association represents funeral homes, cemeteries, crematories, monument retailers, and related businesses such as accountants, attorneys, architects and engineers. Please contact me if you have any questions or wish additional information. Thank you,

Very truly yours,

Robert M. Fells
External Chief Operating Officer
and General Counsel