



ASSURANT

Preneed

RECEIVED

2007 NOV -7 AM 10:33

PO Box 2730
Rapid City, SD 57709-2730
T 800.352.5173

#2639

INDEPENDENT REGULATORY
REVIEW COMMISSION

www.assurant.com

January 5, 2006

Ernie Heffner
President
Pennsylvania Cemetery Funeral Association
c/o Heffner Funeral Homes
1551 Kenneth Road
York, PA 17404

Re: Draft Regulations concerning the Activities of Employees
and Agents of Licensed Funeral Directors involved in
Preneed Arrangements Suggested by the Pennsylvania
Cemetery Funeral Association (PCFA) ("Draft Regulation")

Dear Mr. Heffner:

This letter is in reference to the PCFA "Draft Preneed Activities by Employees and Agents of Licensed Funeral Directors" under Annex A, Title 39, Professional and Occupational Affairs, Chapter 13; State board of Funeral Directors – General Provisions.

We have been given the opportunity to review the draft regulations and we believe they represent a responsible and fair method of disseminating needed information to the Pennsylvania consumers in order to help them prearrange their funerals.

We appreciate all of the efforts you and your staff, along with others from the death care, trust and insurance industries, have made to prepare this comprehensive draft.

This letter is sent on behalf of Assurant Preneed. Assurant Preneed is a major preneed insurance and annuity underwriter in the U.S. and Canada. Assurant Preneed includes American Memorial Life Insurance Company (a South Dakota domestic), the preneed operations of Union Security Insurance Company (an Iowa domestic), and United Family Life Insurance Company (a Georgia domestic).

Page 2

This letter confirms that the proposed draft regulation has the full support of Assurant Preneed.

Thank you for allowing us the opportunity to comment.

Very truly yours,

Matthew F. McGuire
Chief Legal Officer
Assurant Preneed
Tel: 605-719-0100
Toll Free: 800-352-9281
Fax: 605-719-0853
Email: matt.mcguire@assurant.com

MFM/cj