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John W. Eirkson, C.A.E.
Executive Director

November 25, 2014

Kathleen K. Ryan, Esq.
General Counsel and
Chief Operating Officer

David Sumner, Executive Director
IRRC
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: #18-461 – 67 Pa. Code, Chapter 101

Dear Mr. Sumner:

The Pennsylvania Funeral Directors Association represents approximately 1100 funeral homes throughout the Commonwealth who employ approximately 2100 licensed funeral directors. Many of those funeral directors direct traffic for funeral processions in the regular course of business pursuant to 75 Pa. C.S. Sec. 3102.

In reviewing the above proposed regulation, it appears that funeral directors would also be required to comply with the training component of Sec. 101.2 (8). Funeral directors are already subject to six hours of continuing education per renewal cycle. Not all of them direct traffic. To require all licensees to complete this program would unduly burden those who do not direct traffic.

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Your Profession Our Passion

Under the circumstances, we would request that licensed funeral directors be exempted from the training component of this proposed regulation.

Very truly yours,


Kathleen K. Ryan, Esquire

cc: Jeffrey M. Spotts, Esquire
Dept. of Transportation
P.O. Box 8212
Harrisburg, PA 17105-8212