



Hansen-Spear

F U N E R A L H O M E

ORIGINAL



7-13-99

Secretary, Federal Trade Commission
 Room H-159
 600 Pennsylvania Avenue N.W.
 Washington, D.C. 20580
 Re: 16 CFR Part 453

To whom it may concern:

I am writing to comment on the Funeral Rule. I personally think that the current rule has been good for consumers, although initially I had been opposed to it. It makes the amount of information available a lot greater.

It is with this in mind that I would suggest support for the idea of expanding the rule to include ALL providers. This would be very beneficial to the consumer, and that should be the focus of the debate, just as it was in the 1970s. With the advent of cemeteries and other third party sellers getting involved in the market, it seems only fair to the consumer that they be able to compare prices from each provider. There currently is not that level of ability with most cemeteries.

In my community we have a cemetery which has become heavily involved with the sale of caskets and vaults. This should be beneficial to the consumer. However, the usual sales pitch includes the caveat that "...prices will be going up on Monday by several hundred dollars, so you need to make the decision now!" This does not allow the advantage of 'price shopping' and comparing like products which would result in less cost to the consumer. Likewise, comments prohibited by us concerning the protective qualities of merchandise are not prohibited by them. This makes claims about protective vaults and protective caskets confusing to the consumer when they feel they have purchased a protective vault or casket from a third party and then have it explained that they have not.

Most in our industry feel that competition is good for the consumer. In a letter from the attorney for the Illinois Cemetery Association concerning then pending legislation, they also supported this type of competition. "It is the objective of the Illinois Cemetery Association to promote competition in the sale of pre-need funeral services and merchandise, on an equitable basis, throughout the state of Illinois. Only through such competition can the interests of the consuming public be truly served."

If you make the competition equitable, the consumer will be the winner. Thank you for taking time to consider this. If you desire/require the entire letter from Lapin, et.al. referred to above, please let me know.

Sincerely,

Jeffrey Spear, director